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STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
OFFICE OF PROFESSIONAL STANDARDS HPS7

In the Matter of the License to Practice )  
As a Psychologist of: )

LAURA S. BROWN, Ph.D., )  
License No. PY00000615, )

Respondent. )

Docket No. 99-12-A-1016PY

PREHEARING ORDER NO. 5:  
ORDER CONTINUING  
STATUS CONFERENCE

Health Law Judge John F. Kuntz, Presiding Officer for the Examining Board of Psychology (the Board), considered a request to continue the status conference made by the parties in this matter. Robert Hargreaves, Assistant Attorney General, represents the Department of Health (the Department). Kenneth S. Kagan, Attorney at Law, represents Laura S. Brown, Ph.D. (the Respondent). Having considered the request and pleadings in this matter, the Presiding Officer now enters the following:

**I. RELEVANT PROCEDURAL HISTORY AND FINDINGS OF FACT**

1.1 On November 7, 2001, the Department filed its Prehearing Statement and Motions with the Adjudicative Clerk Office. The Department moved for leave to amend the pleadings in this matter. The Department stated this motion was "necessitated in part by a reassessment of the supporting evidentiary facts in this matter, and, in part, by preliminary settlement discussions."

1.2 On November 14, 2001, the Presiding Officer conducted a telephone prehearing conference with the parties. The parties stated they scheduled a settlement conference in this matter on November 30, 2001, and requested a continuance of the

PREHEARING ORDER NO. 5: ORDER CONTINUING  
STATUS CONFERENCE – Page 1 of 4

Docket No. 99-12-A-1016PY

prehearing conference to allow the completion of the settlement process. The Presiding Officer granted both the Department's motion to amend and the request by the parties to continue the matter. The parties received verbal notification that the status conference was continued to January 22, 2002, but the Presiding Officer issued no written order confirming the continuance.

1.3 On November 29, 2001, the Board issued a Second Amended Statement of Charges, alleging the Respondent engaged in unprofessional conduct in violation of RCW 18.130.180(4) and (7); WAC 246-924-354, WAC 246-924-356, WAC 246-924-357, WAC 246-924-359 and WAC 246-924-363.

1.4 On November 29, 2001, the Respondent was served, by mail, with the Second Amended Statement of Charges.

1.5 On December 31, 2001, the Adjudicative Clerk Office served the parties with a Notice of Failure to Respond, advising the parties the Respondent had not responded to the Second Amended Statement of Charges.

1.6 On January 22, 2002, the Presiding Officer did not initiate the status conference telephone call with the parties. Upon discovering the error, the matter was rescheduled to January 29, 2002, at 2:00 p.m.

1.7 On January 29, 2002, the Presiding Officer initiated the status conference with the parties. The Department stated the amended pleadings were issued to facilitate settlement between the parties at the settlement conference, and the Department did not expect the Respondent to file an answer to the amended pleadings. The Department stated all necessary parties attended the settlement conference on

**PREHEARING ORDER NO. 5: ORDER CONTINUING  
STATUS CONFERENCE – Page 2 of 4**

**Docket No. 99-12-A-1016PY**

November 30, 2001, and negotiated a settlement agreement as a result of discussions at that conference. Subsequent to that conference the Department received a new complaint regarding the Respondent's license. Given the holidays, the necessary review of this new complaint was only recently completed by the Department. The Reviewing Commission Member has not reviewed this new complaint, and the Respondent has not received all relevant information regarding the complaint. For that reason the Respondent has not signed the negotiated settlement agreement.

1.8 The Department believes that if the new complaint requires further action, it may be possible to include that matter in the settlement agreement previously negotiated by the parties. The Department requests a continuance for that reason.

1.9 The Respondent agrees with the representations made by the Department. The Respondent agrees with the Department's request for a short continuance in this matter, which will allow her to make a final decision on the new complaint and whether she will sign the previously negotiated settlement agreement.

## **II. CONCLUSIONS OF LAW**

2.1 The Presiding Officer shall rule on motions. WAC 246-11-380(1). The Presiding Officer may grant a continuance for good cause. WAC 246-11-380(3). Informal settlement of matters that may make unnecessary more elaborate proceedings under this chapter [chapter 34.05 RCW] is strongly encouraged. RCW 34.05.060.

2.2 The parties have negotiated a settlement agreement in this matter, but need additional time to review additional material (a recently received complaint) before

finalizing settlement. The Presiding Officer concludes there is good cause to continue this matter.

### III. ORDER

Based on the foregoing Relevant Procedural History and Findings of Fact, and Conclusions of Law, the Presiding Officer issues the following ORDERS:

3.1 The prehearing/status conference scheduled for January 29, 2002, is CONTINUED. There shall be a **telephone** status conference on **February 14, 2002, at 9:00 a.m.** The Presiding Officer will initiate the status conference with the parties.

3.2 In the event the parties file a signed copy of the settlement agreement with the Adjudicative Clerk Office, the Presiding Officer will strike or continue the status conference without further action by the parties.

DATED THIS 30<sup>th</sup> DAY OF JANUARY, 2002.

  
JOHN B. KUNTZ, Health Law Judge  
Presiding Officer

**DECLARATION OF SERVICE BY MAIL**

I declare that today I served a copy of this document upon the following parties of record:

KENNETH KAGAN, ATTORNEY AT LAW, AND ROBERT HARGREAVES, AAG by mailing a copy properly addressed with postage prepaid.

DATED AT OLYMPIA, WASHINGTON THIS 31<sup>st</sup> DAY OF JANUARY, 2002.

  
Adjudicative Clerk Office

cc: JANICE BODEN  
SUSAN MYERS

<b>FOR INTERNAL USE ONLY:</b> (Internal tracking numbers) Program No. 98-10-0004
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**PREHEARING ORDER NO. 5: ORDER CONTINUING  
STATUS CONFERENCE – Page 4 of 4**

**Docket No. 99-12-A-1016PY**



*Margaret**4/24/01***L. Brown Sanctions***Here are my comments  
Sorry for the delay**Joanne*

Based on the preceding Stipulated Facts and Conclusions of Law, Respondent agrees to entry of the following Agreed Order:

4.1 Respondent's license shall be and is SUSPENDED for at least five (5) years. The suspension shall be stayed subject to the following terms and conditions:

4.1.1 Respondent's practice shall be supervised by a psychiatrist approved in advance by the Board. The supervisor must be approved within sixty (60) days of the effective date of this Order. The stay shall commence at the time the supervisor is approved and only periods under supervision shall count towards reducing the term of suspension. The supervisor shall have experience in forensic psychology/psychiatry and at least ten (10) years in practice in the State of Washington and shall be identified and approved according to the Board's policy on supervisors and therapists.

4.1.1.1 The supervisor shall have access to all client files and shall meet with Respondent to review cases on a schedule set by the supervisor, but not less than one (1) hour per ten (10) hours of practice for the first year and one (1) hour per thirty (30) hours of practice thereafter.

4.1.1.2 Within thirty days of commencing supervision and subject to approval by the supervisor, Respondent shall develop definitions and limitations on consultation, evaluation, therapy, forensic, and other services and the resulting professional professional relationships. Appropriate disclosure forms shall be developed and approved by the supervisor. These disclosure forms

<sup>reference to</sup>  
must include the existence of this Order and information on how to  
obtain an copy of the Order from the Board.

- 4.1.1.3 Respondent shall provide a copy of this Order to the supervisor prior to beginning the relationship. Respondent shall cause the supervisor to submit directly to the Board a written supervision plan at the beginning of the relationship. The plan shall be developed after an <sup>? who are the mandatory participants?</sup> initial meeting with representative(s) of the Board to set expectations and responsibilities. The plan shall include supervision of practice, regular review of all client cases, educational activities, <sup>do we want to compel taping?</sup> [audio and/or videotaping sessions], and other elements as determined by the supervisor. The plan shall also include regular face-to-face meetings with Respondent, weekly during the first year <sup>at least</sup> and monthly thereafter. The plan may be revised from time to time as determined by the supervisor, but must meet the requirements of this Order and must be submitted to the Board within fourteen (14) days of revision. The plan shall also include regular activity and progress reports directly from the supervisor to the Board. The activity and progress reports shall be due the first day of January, April, July, and October of each year. Respondent shall provide the supervisor access to all files, tapes of sessions, and all other materials and communications as determined by the <sup>supervisor</sup> ~~mentor~~. Responsibility for adhering to the plan,

Board according to the Board's policy on supervisors and treatment providers.

Respondent shall execute releases to permit the evaluator to communicate with all current and recent mental health professionals providing evaluation or therapy to Respondent. The evaluator shall complete the evaluation and submit a written report to the Board and to the supervisor within sixty (60) days of commencing the evaluation. If the evaluator recommends therapy, Respondent shall follow the

recommendations.

4.1.5<sup>6</sup> Respondent shall enter or continue therapy with a psychologist or psychiatrist IF recommended, per 4.1.5<sup>5</sup> approved in advance by the Board. The treating provider shall have expertise in addressing boundary issues with mental health practitioners. The treating provider shall be furnished copies of the Statement of Charges and this Agreed Order. The treating provider shall submit quarterly written reports directly to the Board and to the supervisor describing Respondent's progress in therapy with particular attention to issues related to the events described in the Statement of Charges and Respondent's future management of these issues. Therapy shall occur on a schedule and for a duration to be determined by the treating provider, but therapy shall not cease until the treating provider certifies to the Board that Respondent has adequately addressed the relevant issues to a point that she is able to practice with reasonable safeguards for clients.

← 4.1.6<sup>7</sup> Respondent shall have no contact with any of the Clients identified in this proceeding.

4.1.7<sup>8</sup> Any periods during which Respondent is not in active practice in the state of Washington for at least twenty (20) hours per week shall not count towards the

reduction of the term of this Order. Respondent shall inform the Board in writing of any such periods within thirty (30) days of commencement and cessation of the period.

9  
4.1.8 Respondent shall not supervise or direct the training of persons entering the mental health fields. This shall include but is not limited to <sup>practica</sup> interns <sup>hips</sup> and postdoctoral programs. ✓

4.2 Within ten (10) days of the effective date of this order, Respondent shall thoroughly complete the attached Healthcare Integrity and Protection Data Bank Reporting Form (Section 1128 of the Social Security Act) and return it to the Department of Health, Legal Unit, P.O. Box 47869, Olympia, WA 98504-7869.

4.3 Respondent shall obey all federal, state, and local laws and all administrative rules governing the practice of the profession in Washington.

4.4 Respondent shall assume all costs of complying with this Agreed Order.

4.6<sup>5</sup> If Respondent violates any provision of this Agreed Order in any respect, the Board may take further action against Respondent's license.

4.6 Respondent shall inform the Board in writing of changes in her residential and business addresses within thirty (30) days of such change.

4.7 In the event that Respondent should leave Washington to reside or to practice outside the state, Respondent must notify the Board in writing of the dates of departure and return and the destination within thirty (30) days of the departure or return. Periods of residency or practice outside Washington will not apply to the reduction of the term of this Order. Respondent agrees that the Board may communicate with the licensing authority in any other jurisdiction.

4.8 Respondent may petition for modification of this Order or reinstatement at such time as she has completed five (5) years of supervised practice in the state of Washington. The Board may impose such conditions as it then determines appropriate.

# Case Information Cover Sheet

[Please complete the appropriate section(s)]

## 1. Docket Number: 99-12-A-1016PY

<b>Respondent Name:</b> Laura S. Brown	<b>Today's Date:</b> 11/29/01
<b>Address:</b> 4527 1 <sup>st</sup> Avenue NE	<b>Program Manager:</b> Janice Boden
<b>Seattle, WA</b> 98105	<b>Staff Attorney:</b> Margaret J. Gilbert
<b>Respondent Attorney:</b> James E. Lobsenz	<b>AAG:</b> Kim O'Neal
<b>Address:</b> 701 Fifth Ave. Ste. 2200	<b>Charging Panel:</b>
<b>Seattle, WA</b> 98104-7091	<b>Compliance Person:</b> Janice Boden
<b>Reviewing Bd/Comm Member:</b> Barber	<b>Cc:</b> Traci Troutman

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent

## 3. Proposed Timeline Criteria: (Estimated at time of charging)

**NOTE:** The proposed criteria listed below are intended to provide a means for the Program to provide input on scheduling at the time of charging. They are not intended as a final decision on scheduling, and may be subject to change based upon receipt of an answer from the Respondent. For more complete instructions, please see NOTES on the back of this form.

### ☐ 4 months

Admission of guilt; 1 charge  
Noncompliance  
Application denial  
Action in another jurisdiction

### ☐ 5 months

One straight-forward issue  
(e.g. 1 charge of diversion)

### ☐ 6 months

Multiple charges  
Practice issues  
Convicted; Multiple charges

### ☐ 9 months

Multiple, complex, technical issue  
Multiple parties, complex issues  
(e.g. Most Certificate of Need cases; Complex practice issues)

☐ Other: \_\_\_\_\_

## 4. Special instructions/considerations:

- ◆ # of anticipated hearing days: \_\_\_\_\_
- ◆ Use pre-set hearing dates: ☐ Yes ☐ No
- ◆ Translator/Interpreter Needed: ☐ Yes ☐ No
- ◆ Need special hearing dates: ☐ Yes ☐ No
- ◆ Hearing date: \_\_\_\_\_
- ◆ Other: \_\_\_\_\_

**FOR USE BY CLERK OFFICE ONLY**



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
*Olympia, Washington 98504*

November 29, 2001

Kenneth S. Kagan  
CARNEY BADLEY SMITH, et al  
Law Offices  
2200 Columbia Center  
701 Fifth Avenue  
Seattle, WA 98104-7091

Laura S. Brown, Ph.D.  
4527 – 1<sup>st</sup> Avenue N.E.  
Seattle, WA 98105

Dear Dr. Brown and Mr. Kagan:

Enclosed please find a copy of the following documents issued to you:

- Second Amended Statement of Charges
- Notice of Opportunity for Settlement and Hearing
- Answer to Second Amended Statement of Charges and Request for Settlement and Hearing
- Stipulated Findings of Fact, Conclusions of Law, and Agreed Order (proposed)
- Healthcare Integrity and Protection Data Bank Reporting Form
- Department of Health Disciplinary Guidelines

Please be advised that the Answer to the Second Amended Statement of Charges and Request for Settlement and Hearing form must be completed and received by the Adjudicative Clerk Office no later than twenty (20) days from the date it was mailed to you.

I will be representing the Department of Health during the initial stages of this matter, and through the settlement conference. If this matter cannot be settled and proceeds to a hearing, an assistant attorney general will represent the Department at that hearing. Accordingly, please direct all questions regarding settlement to me.

If you agree with the proposed terms and conditions, please sign the Stipulated Findings of Fact, Conclusions of Law, and Agreed Order and return it to me by December 19, 2001. I will present the Order to the disciplinary authority for acceptance at the first available opportunity. If I do not receive the signed Order from you on or before December 19, 2001, I will assume that you have rejected the settlement offer.

Laura S. Brown, Ph.D.  
November 29, 2001  
Page Two

In addition, I have enclosed a document entitled "Healthcare Integrity and Protection Data Bank Reporting Form". Pursuant to federal law, 45 CFR part 61, you are required to complete this form and return it to the Adjudicative Clerk Office.

You do have the right, and are encouraged, to obtain private counsel to advise and instruct you concerning this matter. If you have any questions regarding the enclosed documents or the adjudication process, please contact me at (360) 236-4913.

Sincerely,

A handwritten signature in black ink, appearing to read "Margaret J. Gilbert", written in a cursive style.

MARGARET J. GILBERT  
Staff Attorney

Enclosures

cc: Janice Boden, Program Manager  
Reviewing Board Member



**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY**

In the Matter of the License to Practice as  
a Psychologist of:

**LAURA S. BROWN, Ph.D.,**  
Credential No. PY00000615

Respondent.

) **Docket No. 99-12-A-1016PY**

) **DECLARATION OF SERVICE  
BY MAIL**

) **Program Nos. 98-10-0004PY  
& 99-02-0006PY**

I declare under penalty of perjury under the laws of the state of Washington that  
the following is true and correct:

On November 29, 2001, I served a true and correct copy of the  
Second Amended Statement of Charges; Answer to the Second Amended Statement  
of Charges and Request for Settlement and Hearing; Notice of Opportunity for  
Settlement and Hearing; Stipulated Findings of Fact, Conclusions of Law, and Agreed  
Order (proposed); Healthcare Integrity and Protection Data Bank Reporting Form; and  
Department of Health Disciplinary Guidelines; by placing same in the U.S. mail by  
4:00 p.m., postage prepaid, on the following parties to this case:

Robert C. Hargreaves, AAG  
Office of the Attorney General  
P.O. Box 40100  
Olympia, WA 98504-0100

Laura S. Brown, Ph.D.  
4527 -- 1<sup>st</sup> Avenue N.E.  
Seattle, WA 98105

Kenneth S. Kagan  
CARNEY BADLEY SMITH, et al  
2200 Columbia Center  
701 Fifth Avenue  
Seattle, WA 98104-7091

DATED: November 29, 2001, at Olympia, Washington.

Susan Myers  
SUSAN MYERS, Legal Secretary

Original filed with:  
Department of Health  
Adjudicative Clerk Office  
1107 Eastside Street  
P.O. Box 47879  
Olympia, WA 98504-7879

**ORIGINAL**

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY**

In the Matter of the License to Practice as  
a Psychologist of

**LAURA S. BROWN, Ph.D.,**  
Credential No. PY00000615.

Respondent.

Docket No. 99-12-A-1016PY

**SECOND AMENDED STATEMENT OF  
CHARGES**

The Program Manager of the Examining Board of Psychology on designation by the Board makes the allegations below, which are supported by evidence contained in program case file nos. 98-10-0004PY and 99-02-0006PY. Any clients, patients or other third parties, other than health care providers, referred to in this Amended Statement of Charges are identified in the attached Confidential Schedule.

**Section 1: ALLEGED FACTS**

1.1 Laura S. Brown, Ph.D., Respondent, was issued a license to practice as a psychologist in the State of Washington in January 1979.

1.2 In approximately February 1995, Respondent entered into a forensic consultation relationship with an individual who then resided in Georgia. Thereafter, in approximately November 1996, Respondent entered into a professional research relationship with this individual (Colleague A).

1.3 Respondent subsequently suggested that Colleague A consider relocating to Washington State. Respondent put Colleague A in touch with one of Respondent's clients, Client B, who lived in Port Townsend, Washington. Respondent had been providing therapy to Client B since July 1989. Respondent obtained Client B's consent before putting Colleague A and Client B in touch with each other.

1.4 During the spring of 1997, Colleague A and Client B corresponded and met with each other, and became close friends. Colleague A then moved to Port Townsend in late June 1997.

1.5 In the summer of 1997, Client B began using her therapy sessions and e-mail exchanges with Respondent to address problems she was having in her relationship with Colleague A. These problems persisted at least into early 1998. Respondent held a number of joint sessions with Client B and Colleague A during this time frame.

1.6 Respondent shared some of her own personal problems with Client B, to include problems Respondent was having in her own relationship with Colleague A.

1.7 Respondent disclosed confidential information about Client B to Colleague A and Client B's partner, without Client B's informed written consent.

1.8 In July 1998, Respondent formally terminated her professional services with Client B. However, Respondent's therapy relationship with Client B was or should have been terminated earlier, and Respondent did not timely offer to help Client B find an alternative source of professional services or assistance.

1.9 Respondent failed to maintain adequate records of the professional services that she provided to Client B.

1.10 Between approximately January 1990 and April 1992, Respondent served as practice supervisor to Arthur Peskind, Ph.D., who was under Board Order as a result of a sexual relationship with a client. After the required supervision ended, Dr. Peskind continued to consult with Respondent.

1.11 In approximately 1993, Respondent evaluated Client C in connection with litigation undertaken by Client C against a former therapist. During the evaluation process, Respondent suggested Client C might seek treatment from Dr. Peskind for issues related to panic disorder. Client C began treatment with Dr. Peskind in May 1993.

1.12 Respondent continued to serve as consultant to Dr. Peskind after May 1993. Client C was one of Dr. Peskind's cases he discussed with Respondent.

1.13 After May 1993, Respondent met with Client C on occasion to address issues presented by Client C that were not related to the forensic evaluation, to include issues arising in Client C's treatment with Dr. Peskind. When Client C's problems with her therapy and relationship Dr. Peskind escalated, Respondent counseled both individuals in an attempt to assist in gaining resolution, an effort Respondent termed "consultation to the process of therapy." Respondent kept no records of these consultations.

## **Section 2: ALLEGED VIOLATIONS**

2.1 The violations alleged in this section constitute grounds for disciplinary action pursuant to RCW 18.130.180, and imposition of sanctions under RCW 18.130.160.

2.2 The facts alleged in paragraphs 1.2, 1.3, 1.5 and 1.6 constitute unprofessional conduct in violation of RCW 18.130.180(4), (7), WAC 246-924-356, and WAC 246-924-357, the texts of which are provided in paragraph 2.7.

2.3 The facts alleged in paragraph 1.7 constitute unprofessional conduct in violation of RCW 18.130.170(4), (7) and WAC 246-924-363(1), the texts of which are provided in paragraph 2.7.

2.4 The facts alleged in paragraph 1.8 constitute unprofessional conduct in violation of RCW 18.130.180(4), (7) and WAC 246-924-359(2), the texts of which are provided in paragraph 2.7.

2.5 The facts alleged in paragraph 1.9 constitute unprofessional conduct in violation of RCW 18.130.180(4), (7) and WAC 246-924-354, the texts of which are provided in paragraph 2.7.

2.6 The facts alleged in paragraphs 1.10 through 1.13 constitute unprofessional conduct in violation of RCW 18.130.180(4), (7), WAC 246-924-354, and WAC 246-924-357, the texts of which are provided in paragraph 2.7.

### **2.7**

**RCW 18.130.180 Unprofessional conduct.** The following conduct, acts, or conditions constitute unprofessional conduct for any license holder or applicant under the jurisdiction of this chapter:

....

(4) Incompetence, negligence, or malpractice which results in injury to a patient or which creates an unreasonable risk that a patient may be harmed. The use of a nontraditional treatment by itself shall not constitute unprofessional conduct, provided that it does not result in injury to a patient or create an unreasonable risk that a patient may be harmed;

...  
(7) Violation of any state or federal statute or administrative rule regulating the profession in question, including any statute or rule defining or establishing standards of patient care or professional conduct or practice;  
....

**WAC 246-924-354 Maintenance and retention of records. (1)**

The psychologist rendering professional services to a client or clients or rendering services billed to a third party payor, shall document services except as provided in (g) of this subsection. That documentation shall include:

- (a) The presenting problem(s), purpose or diagnosis;
  - (b) The fee arrangement;
  - (c) The date and service provided;
  - (d) A copy of all tests and evaluative reports prepared;
  - (e) Notation and results of formal consults including information obtained from other persons or agencies through a release of information;
  - (f) Progress notes reflecting on-going treatment and current status;
  - (g) If a client requests that no treatment records be kept and the psychologist agrees to the request, the request must be in writing and only the following must be retained:
    - (i) Identity of the recipient of services;
    - (ii) Service dates and fees;
    - (iii) Description of services;
    - (iv) Written request that no records be kept.
- (2) The psychologist shall not agree to the request if maintaining records is required by other state or federal law.

**WAC 246-924-356 Impaired objectivity.** The psychologist shall not undertake or continue a professional relationship with a client when the competency of the psychologist is impaired due to mental, emotional, physical, pharmacological, or substance abuse conditions. If such a condition develops after a professional relationship has been initiated, the psychologist shall terminate the relationship in an appropriate manner, and shall assist the client in obtaining services from another professional.

**WAC 246-924-357 Multiple relationships.** The psychologist shall not undertake or continue a professional relationship with a client when the objectivity or competency of the psychologist is impaired because of the psychologist's present or previous familial, social, sexual, emotional, financial, supervisory, political, administrative, or legal relationship with the client or a person associated with or related to the client. When such relationship impairs objectivity, the psychologist shall terminate the professional relationship with adequate notice and in an appropriate manner; and shall assist the client in obtaining services from another professional.

**WAC 246-924-359 Client welfare.**

(2) Termination of services. Whenever professional services are terminated, the psychologist shall offer to help locate alternative sources of professional services or assistance if necessary. Psychologists shall terminate a professional relationship when it would become clear to a reasonable, prudent psychologist that the client no longer needs the service, is not benefitting, or is being harmed by continued service.

**WAC 246-924-363 Protecting confidentiality of clients.** (1) In general. The psychologist shall safeguard the confidential information obtained in the course of practice, teaching, research, or other professional duties. With the exceptions set forth below, the psychologist shall disclose confidential information to others only with the informed written consent of the client.

....

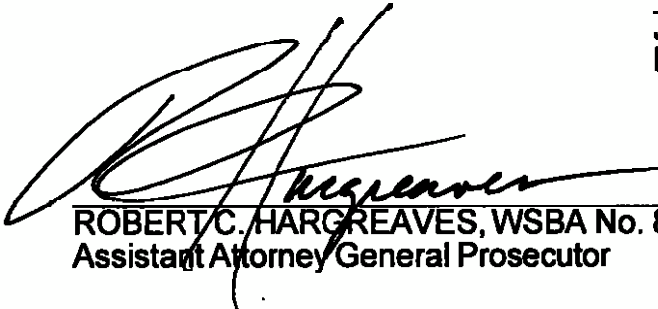
**Section 3: NOTICE TO RESPONDENT**

The charges in this document affect the public health, safety, and welfare. The Program Manager of the Examining Board of Psychology directs that a notice be issued and served on Respondent as provided by law, giving Respondent the opportunity to defend against these charges. If Respondent fails to defend against these charges, Respondent shall be subject to discipline pursuant to RCW 18.130.180 and the imposition of sanctions under RCW 18.130.160.

DATED: November 29, 2001.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY

  
JANICE K. BODEN  
Program Manager

  
ROBERT C. HARGREAVES, WSBA No. 8761  
Assistant Attorney General Prosecutor

FOR INTERNAL USE ONLY. INTERNAL TRACKING NUMBERS: 98-10-0004PY and 99-02-0006PY

## CONFIDENTIAL SCHEDULE

**This information is confidential and is NOT to be released without the consent of the individual or individuals named herein, or unless otherwise authorized by law.**

**Colleague A**

**Client B**

**Client C**

6 - Investigative Records Compiled by agency inv...

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY**

In the Matter of the License to Practice as a Psychologist of:	)	
	)	<b>Docket No. 99-12-A-1016PY</b>
	)	
<b>LAURA S. BROWN, Ph.D.,</b>	)	<b>NOTICE OF OPPORTUNITY</b>
<b>Credential No. PY00000615</b>	)	<b>FOR SETTLEMENT AND</b>
	)	<b>HEARING</b>
<u>Respondent.</u>	)	

You are notified that a Second Amended Statement of Charges has been issued by the Examining Board of Psychology (Board), a copy of which is enclosed. The Second Amended Statement of Charges initiates the process by which the Board will determine whether you have committed unprofessional conduct pursuant to RCW 18.130.180(4) and (7), WAC 246-924-354, WAC 246-924-356, WAC 246-924-357, WAC 246-924-359(2), and WAC 246-924-363(1), as alleged in the Second Amended Statement of Charges. If you are found to have committed unprofessional conduct, the Board will determine the appropriate sanctions as provided in RCW 18.130.160.

You may request an adjudicative proceeding by filing an answer to the Second Amended Statement of Charges. Your answer to the Second Amended Statement of Charges provides you the opportunity to request an adjudicative proceeding or to waive the opportunity for an adjudicative proceeding, pursuant to RCW 34.05.413 and WAC 246-11-270. An answer form is enclosed.

**YOUR ANSWER TO SECOND AMENDED STATEMENT OF CHARGES MUST  
BE RECEIVED BY THE ADJUDICATIVE CLERK OFFICE WITHIN TWENTY (20)  
DAYS FROM THE DATE THIS NOTICE WAS MAILED TO YOU. If the twenty (20) day**



limit results in a hardship upon you, you may request in writing an extension for good cause not to exceed sixty (60) additional days. A request for extension must be received by the Adjudicative Clerk Office within twenty (20) days from the date this notice was mailed to you. The Presiding Officer will grant an extension for good cause.

Failure to file an answer within the twenty (20) day time limit or within the time limit established by a hardship extension constitutes a default. Pursuant to RCW 34.05.440 and WAC 246-11-280, a default will result in the loss of your right to an adjudicative proceeding, including a hearing, and resolution of the case without your participation. A default may result in the suspension or revocation of your license.

If you waive your opportunity for settlement and hearing, the case will be resolved without your further participation. Resolution of the case may include suspension or revocation of your license to practice as a psychologist in the state of Washington. You may submit a written statement for consideration by the Board, so long as that statement is received by the Adjudicative Clerk Office within twenty (20) days of the date this notice was mailed to you or within the time limit established by a hardship extension.

If you request an adjudicative proceeding, you will have an opportunity to settle the matter prior to a hearing. In seeking a settlement, you may submit a written statement and any supporting materials for consideration. A written settlement offer may be included with the Second Amended Statement of Charges or may be sent to you at a later date. If a settlement cannot be achieved through written documents, a settlement conference will be held. If a settlement cannot be reached, then the matter will proceed to a hearing.

Notice of the date, time, and location of the hearing will be sent to you at least seven (7) days in advance. At the hearing, you may appear personally and may be represented by counsel at your own expense. The hearing will be scheduled and conducted according to the requirements of the Administrative Procedures Act, chapter 34.05 RCW, and the procedural rules of chapter 246-11 WAC.

If you request an adjudicative proceeding but fail to appear or participate in a hearing or other stage of the adjudicative proceeding, you may be held in default pursuant to RCW 34.05.440 and WAC 246-11-280.

Pursuant to RCW 34.05.434, the names, addresses, and telephone numbers of the presiding officer, the parties to whom notice is given, and their representatives are attached and incorporated herein by reference. Pursuant to WAC 246-01-100, Respondent must notify, in writing, the Board and the Adjudicative Clerk Office if Respondent's name and/or address changes.

DATED: November 29, 2001.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY

  
JANICE K. BODEN  
Program Manager

FOR INTERNAL USE ONLY. INTERNAL TRACKING NUMBERS:

PROGRAM NOS. 98-10-0004PY & 99-02-0006PY

**Pursuant to RCW 34.05.434, the following parties, representatives, and officers have been given notice of this proceeding.**

**Adjudicative Clerk Office:**

Department of Health  
Adjudicative Clerk Office  
1107 Eastside Street  
P.O. Box 47879  
Olympia, WA 98504-7879  
Telephone: (360) 236-4677  
FAX: (360) 586-2171

**Presiding Officer:**

Department of Health  
Office of Professional Standards  
1107 Eastside Street  
P.O. Box 47879  
Olympia, WA 98504-7879  
Telephone: (360) 236-4677  
FAX: (360) 586-2171

**Examining Board of Psychology:**

Janice Boden, Program Manager  
Department of Health  
1300 S.E. Quince Street  
P.O. Box 47869  
Olympia, WA 98504-7869  
Telephone: (360) 236-4912

**Respondent:**

Laura S. Brown, Ph.D.  
4527 – 1<sup>st</sup> Avenue N.E.  
Seattle, WA 98105

**Attorney for the Respondent:**

Kenneth S. Kagan  
CARNEY BADLEY SMITH, et al  
2200 Columbia Center  
701 Fifth Avenue  
Seattle, WA 98104-7091  
Telephone: (206) 622-8020  
FAX: (206) 467-8215

**Attorney for the Examining Board of Psychology:**

Robert C. Hargreaves, AAG  
Office of the Attorney General  
P.O. Box 40100  
Olympia, WA 98504-0100

**Representative of the Examining Board of Psychology  
for purposes of settlement negotiations:**

Margaret J. Gilbert, Staff Attorney  
Department of Health, Legal Unit  
1300 S.E. Quince Street  
P.O. Box 47860  
Olympia, WA 98504-7860  
Telephone: (360) 236-4913  
FAX: (360) 236-4930

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY**

In the Matter of the License to Practice as  
a Psychologist of:

**LAURA S. BROWN, Ph.D.,**  
Credential No. PY00000615

Respondent.

) **Docket No. 99-12-A-1016PY**

) **ANSWER TO SECOND AMENDED  
STATEMENT OF CHARGES AND  
REQUEST FOR SETTLEMENT AND  
HEARING**

TO: **Laura S. Brown, Ph.D.**  
**4527 – 1<sup>st</sup> Avenue N.E.**  
**Seattle, WA 98105**

Correct Name:

Correct Address:

Correct Phone:

**INSTRUCTIONS:** This form may be used to answer the Second Amended Statement of Charges and Request Settlement and Hearing. Correct your name, address, and phone number above, if necessary, and enter your answers below and sign and date this form. Return it to:

Department of Health  
Adjudicative Clerk Office  
1107 Eastside Street  
P.O. Box 47879  
Olympia, WA 98504-7879  
Telephone: (360) 236-4677

**THIS FORM MUST BE RECEIVED BY ADJUDICATIVE CLERK OFFICE  
WITHIN TWENTY (20) DAYS FROM THE DATE THIS NOTICE WAS MAILED TO  
YOU. If the twenty (20) day limit results in a hardship upon you, you may request in  
writing an extension for good cause not to exceed sixty (60) additional days. A request**

**ANSWER TO SECOND AMENDED STATEMENT OF CHARGES  
AND REQUEST FOR SETTLEMENT AND HEARING  
Docket No. 99-12-A-1016PY**

**PAGE 1 OF 6**

**ORIGINAL**

for extension must be received by the Adjudicative Clerk Office within twenty (20) days from the date this notice was mailed to you. The Presiding Officer will grant an extension for good cause. Failure to file an answer within the twenty (20) day time limit or within the time limit established by a hardship extension constitutes a default.

Pursuant to RCW 34.05.440 and WAC 246-11-280, a default will result in the loss of your right to an adjudicative proceeding, including a hearing, and resolution of the case without your participation. A default may result in the revocation of your license .

### **Section 1: REQUEST FOR ADJUDICATIVE PROCEEDING**

**INSTRUCTIONS:** Mark one (1) of the following:

- ☐ I waive my opportunity for settlement and hearing. I am enclosing my written statement and/or any materials I wish to have the Board, consider in disposition of the case.
- ☐ I request an opportunity for settlement and a hearing if settlement is not reached. I understand that a scheduling order will be issued and that I (or my attorney) will be required to participate in all stages of the adjudicative proceeding in accordance with chapter 246-11 WAC.
- ☐ I accept the settlement offer as proposed in the Stipulated Findings of Fact, Conclusions of Law, and Agreed Order. I have signed that settlement offer and am returning it. In the event that the settlement is not accepted by the Board of Pharmacy I request a hearing.

//

## Section 2: REPRESENTATION

**INSTRUCTIONS:** Mark the appropriate response and provide correct information:

☐ I will be represented by an attorney who must file a Notice of Appearance.

His/her name, address, and phone number are:

Name:

\_\_\_\_\_

Address:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Telephone:

\_\_\_\_\_

☐ I will not be represented by an attorney.

## Section 3: RESPONSE TO ALLEGATIONS

**INSTRUCTIONS:** Indicate below whether you admit, deny, or do not contest each of the alleged facts and alleged violations contained in the numbered paragraphs in the Second Amended Statement of Charges. Check one (1) response for each numbered paragraph.

//

Paragraph Number	Admit	Deny	Do Not Contest
1.1			
1.2			
1.3			
1.4			
1.5			
1.6			
1.7			
1.8			
1.9			
1.10			
1.11			
1.12			
1.13			
2.1			
2.2			
2.3			
2.4			
2.5			
2.6			
2.7			

**INSTRUCTIONS:** Mark the appropriate response:

- ☐ I have attached a sworn statement in my defense or in mitigation of charges.
- ☐ I have not attached a sworn statement.

**Section 4: INTERPRETER REQUEST**

**INSTRUCTIONS:** Complete the appropriate information if you request an interpreter because of a primary language other than English and/or because of a hearing or speech impairment. If you later determine that an interpreter will be necessary, you must notify the parties listed in the Notice of Opportunity for Settlement and Hearing. Costs for an interpreter will be paid pursuant to WAC 246-11-200.

- ☐ I request that a qualified interpreter be appointed to interpret for me or for my witness(es). My (or my witness(es)) primary language is

\_\_\_\_\_.

- ☐ I request that a qualified interpreter be appointed to interpret for me or for my witness(es). My (or my witness(es)) hearing or speech impairment requires an interpreter able to communicate in the following language:

\_\_\_\_\_.

//

//



## **Section 5: PROCEDURAL RIGHTS**

Pursuant to chapter 34.05 RCW, you have the right to demand a hearing, to be represented by an attorney at your own expense, to subpoena witnesses or the production of books or documents, and to otherwise defend against the allegations in the Second Amended Statement of Charges. The Board has adopted procedural rules for the exercise of these rights and for the conduct of any adjudicative proceeding you request. The rules are contained in chapter 246-11 WAC.

DATED: \_\_\_\_\_.

\_\_\_\_\_  
LAURA S. BROWN, Ph.D.  
Respondent

**FOR INTERNAL USE ONLY. INTERNAL TRACKING NUMBERS:**

**PROGRAM NOS. 98-10-0004PY & 99-02-0006PY**

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY**

In the Matter of the License to Practice as  
a Psychologist of

**LAURA S. BROWN, Ph.D.,**  
Credential No. PY00000615

Respondent.

**Docket No. 99-12-A-1016PY**

**STIPULATED FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND  
AGREED ORDER**

The state of Washington Department of Health (Department) and the Examining Board of Psychology (Board), by and through Christine O. Gregoire, Attorney General and Robert C. Hargreaves, Assistant Attorney General, and Laura S. Brown, Ph.D., Respondent, by and through CARNEY BADLEY SMITH & SPELLMAN and Kenneth S. Kagan, Attorneys at Law, stipulate and agree to the following:

**Section 1: PROCEDURAL STIPULATIONS**

- 1.1 Laura S. Brown, Ph.D., Respondent, was issued a license to practice as a psychologist in the State of Washington in January 1979.
- 1.2 On November 29, 2001, the Board issued a Second Amended Statement of Charges against Respondent.
- 1.3 The Second Amended Statement of Charges alleges that Respondent violated RCW 18.130.180(4), (7), WAC 246-924-354, WAC 246-924-356, WAC 246-924-357, WAC 246-924-359(2), and WAC 246-924-363(1).
- 1.4 Respondent understands that the Department is prepared to proceed to a hearing on the allegations in the Second Amended Statement of Charges.

1.5 Respondent understands that she has the right to defend herself against the allegations in the Second Amended Statement of Charges by presenting evidence at a hearing.

1.6 Respondent understands that should the Department prove the allegations in the Second Amended Statement of Charges at a hearing, the Board has the power and authority to impose sanctions pursuant to RCW 18.130.160.

1.7 Respondent and the Board agree to expedite the resolution of this matter by means of these Stipulated Findings of Fact, Conclusions of Law, and Agreed Order (Agreed Order).

1.8 Respondent waives the opportunity for a hearing on the allegations in the Second Amended Statement of Charges, contingent upon signature and acceptance of this Agreed Order by the Board.

1.9 This Agreed Order is not binding unless and until it is signed and accepted by the Board.

1.10 Should this Agreed Order be signed and accepted it will be subject to the reporting requirements of RCW 18.130.110, the requirements of 45 CFR part 61, and any other applicable interstate/national reporting requirements.

1.11 Should the Board reject this Agreed Order, Respondent waives any objection to the participation at hearing of all or some of the Board members who heard the Agreed Order presentation.

//

## **Section 2: STIPULATED FACTS**

The Department and Respondent stipulate to the following facts:

- 2.1 Laura S. Brown, Ph.D., Respondent, was issued a license to practice as a psychologist in the State of Washington in January 1979.
- 2.2 In approximately February 1995, Respondent entered into a forensic consultation relationship with an individual who then resided in Georgia. Thereafter, in approximately November 1996, Respondent entered into a professional research relationship with this individual (Colleague A).
- 2.3 Respondent subsequently suggested that Colleague A consider relocating to Washington State. Respondent put Colleague A in touch with one of Respondent's clients, Client B, who lived in Port Townsend, Washington. Respondent had been providing therapy to Client B since July 1989. Respondent obtained Client B's consent before putting Colleague A and Client B in touch with each other.
- 2.4 During the spring of 1997, Colleague A and Client B corresponded and met with each other, and became close friends. Colleague A then moved to Port Townsend in late June 1997.
- 2.5 In the summer of 1997, Client B began using her therapy sessions and e-mail exchanges with Respondent to address problems she was having in her relationship with Colleague A. These problems persisted at least into early 1998. Respondent held a number of joint sessions with Client B and Colleague A during this time frame.
- 2.6 Respondent shared some of her own personal problems with Client B, to include problems Respondent was having in her own relationship with Colleague A.

2.7 Respondent disclosed confidential information about Client B to Colleague A and Client B's partner, without Client B's informed written consent.

2.8 In July 1998, Respondent formally terminated her professional services with Client B. However, Respondent's therapy relationship with Client B was or should have been terminated earlier, and Respondent did not timely offer to help Client B find an alternative source of professional services or assistance.

2.9 Respondent failed to maintain adequate records of the professional services that she provided to Client B.

2.10 Between approximately January 1990 and April 1992, Respondent served as practice supervisor to Arthur Peskind, Ph.D., who was under Board Order as a result of a sexual relationship with a client. After the required supervision ended, Dr. Peskind continued to consult with Respondent.

2.11 In approximately 1993, Respondent evaluated Client C in connection with litigation undertaken by Client C against a former therapist. During the evaluation process, Respondent suggested Client C might seek treatment from Dr. Peskind for issues related to panic disorder. Client C began treatment with Dr. Peskind in May 1993.

2.12 Respondent continued to serve as consultant to Dr. Peskind after May 1993. Client C was one of Dr. Peskind's cases he discussed with Respondent.

2.13 After May 1993, Respondent met with Client C on occasion to address issues presented by Client C that were not related to the forensic evaluation, to include issues arising in Client C's treatment with Dr. Peskind. When Client C's problems with her therapy and relationship Dr. Peskind escalated, Respondent counseled both individuals in

an attempt to assist in gaining resolution, an effort Respondent termed "consultation to the process of therapy." Respondent kept no records of these consultations.

### **Section 3: CONCLUSIONS OF LAW**

The Department and Respondent agree to the entry of the following Conclusions of Law:

3.1 The Examining Board of Psychology has jurisdiction over Respondent and over the subject matter of this proceeding.

3.2 The above facts constitute unprofessional conduct in violation of RCW 18.130.180(4) and (7), WAC 246-924-354, WAC 246-924-356, WAC 246-924-357, WAC 246-924-359(2), WAC 246-924-363(1).

3.3 The above violations are grounds for the imposition of sanctions under RCW 18.130.160.

### **Section 4: AGREED ORDER**

Based on the preceding Stipulated Facts and Conclusions of Law, Respondent agrees to entry of the following Agreed Order:

4.1 Respondent's license shall be and is hereby SUSPENDED for at least five (5) years. The suspension shall be STAYED subject to the following terms and conditions:

4.1.1 Respondent's practice shall be supervised by a psychiatrist or psychologist approved in advance by the Board. The supervisor must be approved within sixty (60) days of the effective date of this Agreed Order. The stay shall commence at the time the supervisor is approved and only periods under supervision shall count

towards reducing the term of suspension. The supervisor shall have experience in forensic psychology/psychiatry, at least ten (10) years in practice in the state of Washington, and shall be identified and approved according to the Board's policy on supervisors and therapists.

a. The supervisor shall have access to all client files, to include all e-mail and all other recorded or electronic data pertaining to client contact and/or the provision of professional services.

b. The supervisor shall meet with Respondent to review cases on a schedule set by the supervisor, but not less than one (1) hour per ten (10) hours of practice for the first year, and one (1) hour per thirty (30) hours of practice thereafter.

c. Within thirty (30) days of commencing supervision, and subject to approval by the supervisor, Respondent shall develop definitions and limitations on consultation, evaluation, therapy, forensic, and other professional services, and the resulting professional relationships.

Appropriate disclosure forms shall be developed and approved by the supervisor. These disclosure forms must include reference to the existence of this Agreed Order, and information on how to obtain a copy of the Agreed Order from the Board.

d. Respondent shall provide a copy of this Agreed Order to the supervisor prior to beginning the relationship. The supervisor shall submit directly to the Board a written supervision plan at the beginning of the relationship. The plan shall be developed after an initial meeting with

representative(s) of the Board to set expectations and responsibilities. The plan shall include supervision of practice, regular review of all client cases and files (to include electronic communication), audio and/or videotaping sessions, and other elements as determined by the supervisor. The plan shall also include regular face-to-face meetings with Respondent, at least weekly during the first year and at least monthly thereafter. The plan may be revised from time to time as determined by the supervisor, but must meet the requirements of this Agreed Order and must be submitted to the Board for approval within fourteen (14) days of revision. The plan shall also include regular activity and progress reports submitted directly to the Board by the supervisor. The activity and progress reports shall be due the first day of January, April, July, and October of each year.

e. Respondent shall provide the supervisor access to all files, any tapes of sessions, and all other materials and/or communications, as determined by the supervisor. Responsibility for adhering to the plan including ensuring timely submission of activity and progress reports rests with Respondent.

4.1.2 Respondent shall maintain fully documented files on clients seen and consulted for any and all professional services. Any and all telephone and e-mail communications with clients and others shall be documented and included in the files, in addition to all other required documentation. Therapy files shall be maintained using a SOAP format and shall include a current diagnosis and treatment plan. The supervisor shall establish requirements and format for all other types of files.



4.1.3 Respondent's records shall be subject to random audits to be conducted by the Board's designee. Respondent shall pay the costs of these audits.

4.1.4 Respondent shall pay a fine of fifteen thousand dollars (\$15,000). Five thousand dollars (\$5,000) shall be paid within ninety (90) days of the effective date of this Agreed Order, and the remainder shall be paid according to a payment plan not exceeding five (5) years and established with the Board. Payment shall be by certified or cashier's check or money order, made payable to the Department of Health, mailed to the Department of Health, Examining Board of Psychology, P.O. Box 1099, Olympia, WA 98507-1099.

4.1.5 Within sixty (60) days of the effective date of this Agreed Order, Respondent shall submit to, at her own expense, an evaluation by a psychiatrist or psychologist approved in advance by the Board according to the Board's policy on supervisors and treatment providers. Respondent shall execute releases to permit the evaluator to communicate with all current and recent mental health professionals providing evaluation or therapy to Respondent. The evaluator shall complete the evaluation and submit a written report to the Board and to the supervisor within sixty (60) days of commencing the evaluation. If the evaluator recommends therapy, Respondent shall follow the recommendations.

4.1.6 If recommended by the evaluator pursuant to paragraph 4.1.5, Respondent shall enter or continue therapy with a psychologist or psychiatrist approved in advance by the Board. The treating provider shall have expertise in addressing boundary issues with mental health practitioners. The treating provider shall be furnished a copy of the Second Amended Statement of Charges and this Agreed

Order. The treating provider shall submit quarterly written reports directly to the Board and to the supervisor describing Respondent's progress in therapy with particular attention to issues related to the events described in the Second Amended Statement of Charges and Respondent's future management of these issues. Therapy shall occur on a schedule and for a duration to be determined by the treating provider, but therapy shall not cease until the treating provider certifies to the Board that Respondent has adequately addressed the relevant issues to a point that she is able to practice with reasonable safeguards for clients.

4.1.7 Respondent shall have no further contact with any of the clients identified in this proceeding.

4.18 Any periods during which Respondent is not in active practice in the state of Washington for at least ten (10) hours per week shall not count towards the reduction of the terms of this Agreed Order. Respondent shall inform the Board in writing of any periods of active practice of less than ten (10) hours per week within thirty (30) days of commencement and cessation of the period.

4.2 Within ten (10) days of the effective date of this Agreed Order, Respondent shall thoroughly complete the attached Healthcare Integrity and Protection Data Bank Reporting Form (45 CFR part 61) and return it to the Department of Health, Adjudicative Clerk Office, P.O. Box 47879, Olympia, WA 98504-7879.

4.3 Respondent shall obey all federal, state, and local laws and all administrative rules governing the practice of the profession in the state of Washington.

4.4 Respondent shall assume all costs of complying with this Agreed Order.

4.5 If Respondent violates any provision of this Agreed Order in any respect, the Board may take further action against Respondent's license.

4.6 Respondent shall inform the Board in writing of any change in her residential and/or business address within thirty (30) days of such change, during the period of the stayed suspension under this Agreed Order.

4.7 In the event that Respondent should leave the state of Washington to reside or to practice outside the state of Washington, Respondent shall notify the Board in writing of the dates of departure and return and the destination within thirty (30) days of departure. Periods of residency or practice outside the state of Washington will not apply to the reduction of the term of this Agreed Order. Respondent agrees that the Board may communicate with the licensing authority in any other jurisdiction regarding the terms, conditions, and/or stipulations under this Agreed Order.

4.8 Respondent may petition for modification of this Agreed Order or for reinstatement at such time as she has completed five (5) years of supervised practice in the state of Washington. The Board may impose such conditions as it then determines appropriate.

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I, LAURA BROWN, Ph.D., Respondent, certify that I have read this Stipulated Findings of Fact, Conclusions of Law and Agreed Order in its entirety; that my counsel of record, Kenneth S. Kagan, has fully explained the legal significance and consequence of it; that I fully understand and agree to all of it; and that it may be presented to the Board, without my appearance. If the Board accepts the Stipulated Findings of Fact, Conclusions of Law, and Agreed Order, I understand that I may received a signed copy.

---

LAURA S. BROWN, Ph.D.  
Respondent

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Date

---

KENNETH S. KAGAN, WSBA #12983  
Attorney for Respondent

---

Date

//

//

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**Section 5: ORDER**

The Examining Board of Psychology accepts and enters this Stipulated Findings of Fact, Conclusions of Law, and Agreed Order.

DATED: \_\_\_\_\_

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY

\_\_\_\_\_  
Panel Chair

Presented by:

CHRISTINE O. GREGOIRE  
Attorney General

\_\_\_\_\_  
ROBERT C. HARGREAVES, WSBA #8761  
Assistant Attorney General

\_\_\_\_\_  
Date

FOR INTERNAL USE ONLY. INTERNAL TRACKING NUMBERS:

PROGRAM NOS. 98-10-0004PY & 99-02-0006PY

STIPULATED FINDINGS OF FACT, CONCLUSIONS OF LAW,  
AND AGREED ORDER  
Docket No. 99-12-A-1016PY

PAGE 12 OF 12

# HEALTHCARE INTEGRITY AND PROTECTION DATA BANK - MANDATORY REPORTING COLLECTION FORM

The Healthcare Integrity and Protection Data Bank (HIPDB) is a national health care fraud and abuse data collection program for reporting and disclosing certain final adverse actions taken against health care providers, suppliers, or practitioners and requires that State Government Agencies report all final adverse actions. Please complete and return this form.

<b>FOR DEPARTMENT USE ONLY</b>	
PROFESSION NAME	<b>Psychology</b>
DOCKET NUMBER	<b>99-12-A-1016 PY</b>
CASE NUMBER(s)	<b>98-10-0004;99-02-0006</b>

## FOR RESPONDENT TO VERIFY (COMPLETE IF APPLICABLE)

### PERSONAL INFORMATION

LAST NAME	FIRST NAME	MI
<b>BROWN</b>	<b>LAURA</b>	<b>S</b>

LICENSE NUMBER	SOCIAL SECURITY NUMBER	DATE OF BIRTH	GENDER
<b>PY00000615</b>	<small>4 - DOH Licensee Social Security...</small>	<b>12/24/1952</b>	<b>F</b>

### ADDRESS INFORMATION

### PROFESSIONAL SCHOOL(s) (List up to 5)

ADDRESS INFORMATION	SCHOOL NAME	GRAD YR
<b>4527 1ST AVE NE</b>		
<b>SEATTLE WA 98105</b>		

### ALIAS NAMES (List up to 10)

LAST NAME	FIRST NAME	MI

**ORIGINAL**



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
*Olympia, Washington 98504*

May 11, 2001

James E. Lobsenz  
Carney Badley Smith & Spellman  
Suite 2200  
701 Fifth Avenue  
Seattle WA 98104-7091

RE: 99-12-A-1016PY In re Laura Brown, Ph.D.

Dear Mr. Lobsenz:

Enclosed please find our settlement offer in this case. This represents conditions under which the reviewing board member and staff believe we can resolve the case.

Generally it is helpful for the attorneys – you and me - to talk about this offer after you have had a chance to review it. Sometimes we can reach settlement that way. Other times we decide a face-to-face settlement conference is desirable. If that becomes the situation, we can arrange a mutually agreeable time. Please call me when you are ready to do so.

Sincerely,

A handwritten signature in cursive script, reading "Margaret J. Gilbert".

Margaret J. Gilbert  
Staff Attorney  
(360) 236-4913

cc: file  
Kim O'Neal, AAG

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY**

In the Matter of the License to Practice as a Psychologist of:	)
	) <b>Docket No. 99-12-A-1016PY</b>
	)
<b>LAURA S. BROWN, Ph.D.,</b>	) <b>STIPULATED FINDINGS OF</b>
License Number PY00000615	) <b>FACT, CONCLUSIONS OF LAW,</b>
	) <b>AND AGREED ORDER</b>
<u>Respondent.</u>	)

The Examining Board of Psychology, by and through Margaret J. Gilbert,  
Department of Health Staff Attorney, and Laura S. Brown, Ph.D., Respondent,  
represented by James E. Lobsenz, Attorney at Law, stipulate and agree to the following:

**Section 1: PROCEDURAL STIPULATIONS**

- 1.1 Laura S. Brown, Ph.D., Respondent, was issued a license to practice psychology in the State of Washington in January 1979.
- 1.2 On October 10, 2000, the Board issued a Statement of Charges against Respondent.
- 1.3 The Statement of Charges alleges that Respondent violated RCW 18.130.180(4) and (7), WAC 246-924-354, WAC 246-924-356, WAC 246-924-357, WAC 246-924-359(2), and WAC 246-924-363(1).
- 1.4 Respondent understands that the State is prepared to proceed to a hearing on the allegations in the Statement of Charges.
- 1.5 Respondent understands that she has the right to defend herself against the allegations in the Statement of Charges by presenting evidence at a hearing.

**ORIGINAL**



1.6 Respondent understands that, should the State prove at a hearing the allegations in the Statement of Charges, the Board has the power and authority to impose sanctions pursuant to RCW 18.130.160.

1.7 Respondent and the Board agree to expedite the resolution of this matter by means of this Stipulated Findings of Fact, Conclusions of Law, and Agreed Order (Agreed Order).

1.8 Respondent waives the opportunity for a hearing on the Statement of Charges contingent upon signature and acceptance of this Agreed Order by the Board.

1.9 This Agreed Order is not binding unless and until it is signed and accepted by the Board.

1.10 Should this Agreed Order be signed and accepted it will be subject to the reporting requirements of RCW 18.130.110, the requirements of Section 1128E of the Social Security Act, and any other applicable interstate/national reporting requirements.

1.11 Should this Agreed Order be rejected, Respondent waives any objection to the participation at hearing of all or some of the Board members who heard the Agreed Order presentation.

## **Section 2: STIPULATED FACTS**

The State and Respondent stipulate to the following facts:

2.1 Laura S. Brown, Ph.D., Respondent, was issued a license to practice as a psychologist in the State of Washington in January 1979.

2.2 In approximately February 1995, Respondent entered into a contractual relationship with Client A to provide psychological services. Client A resided in Georgia.

**2.3 Respondent used the term "consultation" to describe her relationship with Client A. As part of this "consultation" relationship, Respondent provided counseling and guidance to Client A on a regular basis. Respondent encouraged Client A to discuss her personal problems and assisted Client A in working through those problems.**

**2.4 In June 1996, Respondent abruptly terminated her relationship with Client A. Respondent refused to communicate with Client A throughout the summer of 1996 and did not offer to help Client A find alternative sources of professional services or assistance.**

**2.5 Respondent and Client A reconciled during the fall of 1996, and Respondent resumed her role as Client A's psychologist.**

**2.6 Respondent subsequently developed a personal friendship with Client A. Respondent began sharing her personal problems with Client A, asking Client A for advice, and using Client A for her own therapeutic needs.**

**2.7 In approximately November 1996, Respondent began a professional research relationship with Client A.**

**2.8 Respondent subsequently urged Client A to relocate from Georgia to Port Townsend, Washington. Respondent offered to put Client A in touch with one of Respondent's clients who lived in Port Townsend (Client B). Respondent had been providing therapy to Client B since approximately 1989. Respondent obtained the consent of both Client A and Client B before putting them in touch with each other.**

2.9 During the spring of 1997, Client A and Client B corresponded with each other by e-mail. Client A moved to Port Townsend in approximately July 1997. Client A and Client B soon became close friends.

2.10 In approximately January 1998, Client B began using her therapy sessions to address problems that she was having in her relationship with Client A.

2.11 Respondent subsequently began sharing her own personal problems with Client B, asking Client B for advice, and using Client B for her own therapeutic needs. Respondent used this process to address problems that she was having in her own relationship with Client A.

2.12 Respondent divulged confidential information about Client A to Client B without Client A's consent.

2.13 Respondent divulged confidential information about Client B to Client A and to Client's B's partner without Client B's consent.

2.14 In June 1998, Respondent abruptly terminated all contact with Client A. She did not offer to help Client A find an alternative source of professional services or assistance.

2.15 In June 1998, Respondent abruptly terminated all contact with Client B. She did not offer to help Client B find an alternative source of professional services or assistance.

2.16 Respondent failed to maintain adequate records of the professional services that she provided to Client A.

2.17 Respondent failed to maintain adequate records of the professional services that she provided to Client B.

2.18 Between approximately January 1990 and April 1992, Respondent served as a practice supervisor to Arthur Peskind, Ph.D., who was under Board Order as a result of a sexual relationship with a client. After the required supervision ended, Dr. Peskind continued to consult with Respondent regarding appropriate handling of cases.

2.19 In approximately 1993, Respondent evaluated Client C in connection with litigation undertaken by Client C against a former therapist. During the evaluation process, Respondent suggested Client C seek treatment from Dr. Peskind for issues related to anxiety. Client C. began treatment with Dr. Peskind in May 1993.

2.20 After May 1993, Respondent continued to serve as consultant to Dr. Peskind. Client C was one case discussed.

2.21 After May 1993, Respondent continued to meet with Client C to address issues presented by Client C and not related to the forensic evaluation. Respondent termed this relationship a "consultation to the process of therapy". Respondent kept no records of these sessions. When Client C expressed concerns about her therapy and relationship with Dr. Peskind, Respondent counseled both individuals.

### **Section 3: CONCLUSIONS OF LAW**

The State and Respondent agree to the entry of the following Conclusions of Law:

3.1 The Examining Board of Psychology has jurisdiction over Respondent and over the subject matter of this proceeding.

3.2 The above facts constitute unprofessional conduct in violation of RCW 18.130.180(4) and (7), WAC 246-924-354, WAC 246-924-356, WAC 246-924-357, WAC 246-924-359(2), and WAC 246-924-363(1).

**3.3 The above violations are grounds for the imposition of sanctions under RCW 18.130.160.**

#### **Section 4: AGREED ORDER**

**Based on the preceding Stipulated Facts and Conclusions of Law, Respondent agrees to entry of the following Agreed Order:**

**4.1 Respondent's license shall be and is SUSPENDED for at least five (5) years. The suspension shall be stayed subject to the following terms and conditions:**

**4.1.1 Respondent's practice shall be supervised by a psychiatrist approved in advance by the Board. The supervisor must be approved within sixty (60) days of the effective date of this Order. The stay shall commence at the time the supervisor is approved and only periods under supervision shall count towards reducing the term of suspension. The supervisor shall have experience in forensic psychology/psychiatry and at least ten (10) years in practice in the State of Washington and shall be identified and approved according to the Board's policy on supervisors and therapists.**

**a. The supervisor shall have access to all client files and shall meet with Respondent to review cases on a schedule set by the supervisor, but not less than one (1) hour per ten (10) hours of practice for the first year and one (1) hour per thirty (30) hours of practice thereafter.**

**b. Within thirty (30) days of commencing supervision and subject to approval by the supervisor, Respondent shall develop definitions and limitations on consultation, evaluation, therapy, forensic, and other**

professional services, and the resulting professional relationships.

Appropriate disclosure forms shall be developed and approved by the supervisor. These disclosure forms must include reference to the existence of this Order and information on how to obtain a copy of the Order from the Board.

c. Respondent shall provide a copy of this Order to the supervisor prior to beginning the relationship. Respondent shall cause the supervisor to submit directly to the Board a written supervision plan at the beginning of the relationship. The plan shall be developed after an initial meeting with representative(s) of the Board to set expectations and responsibilities. The plan shall include supervision of practice, regular review of all client cases, educational activities, audio and/or videotaping sessions, and other elements as determined by the supervisor. The plan shall also include regular face-to-face meetings with Respondent, at least weekly during the first year and at least monthly thereafter. The plan may be revised from time to time as determined by the supervisor, but must meet the requirements of this Order and must be submitted to the Board within fourteen (14) days of revision. The plan shall also include regular activity and progress reports directly from the supervisor to the Board. The activity and progress reports shall be due the first day of January, April, July, and October of each year. Respondent shall provide the supervisor access to all files, tapes of sessions, and all other materials and communications as determined by the supervisor. Responsibility for

adhering to the plan, including causing timely submission of activity and progress reports rests with Respondent.

4.1.2 Respondent shall maintain fully documented files on all clients seen and consulted for any and all professional services. Any and all telephone and e-mail communications with clients and others shall be documented and included in the files in addition to all other required documentation. Therapy files shall be maintained using a SOAP format and shall include a current diagnosis and treatment plan. The supervisor shall establish requirements and format for all other types of files.

4.1.3 Respondent shall limit e-mail communication with clients to arranging and confirming appointments.

4.1.4 Respondent's records shall be subject to random audits to be conducted by the Board's designee. Respondent shall pay the costs of these audits.

4.1.5 Respondent shall pay a fine of thirty thousand dollars (\$30,000.00). Five thousand dollars (\$5000.00) shall be paid within ninety days of the effective date of this Order and the remainder shall be paid according to a payment plan not exceeding five years and established with the Board. Payment shall be by certified or cashier's check or money order, marked with the docket number of this proceeding and mailed to the Department of Health, Examining Board of Psychology, P.O. Box 1099, Olympia, WA 98507-1099.

4.1.6 Within sixty (60) days of the effective date of this Order, Respondent shall submit to, at her own expense, an evaluation by a psychiatrist approved in advance by the Board according to the Board's policy on supervisors and

treatment providers. Respondent shall execute releases to permit the evaluator to communicate with all current and recent mental health professionals providing evaluation or therapy to Respondent. The evaluator shall complete the evaluation and submit a written report to the Board and to the supervisor within sixty (60) days of commencing the evaluation. If the evaluator recommends therapy, Respondent shall follow the recommendations.

4.1.7 If recommended by the evaluator pursuant to paragraph 4.1.6, Respondent shall enter or continue therapy with a psychologist or psychiatrist approved in advance by the Board. The treating provider shall have expertise in addressing boundary issues with mental health practitioners. The treating provider shall be furnished copies of the Statement of Charges and this Agreed Order. The treating provider shall submit quarterly written reports directly to the Board and to the supervisor describing Respondent's progress in therapy with particular attention to issues related to the events described in the Statement of Charges and Respondent's future management of these issues. Therapy shall occur on a schedule and for a duration to be determined by the treating provider, but therapy shall not cease until the treating provider certifies to the Board that Respondent has adequately addressed the relevant issues to a point that she is able to practice with reasonable safeguards for clients.

4.1.8 Respondent shall have no contact with any of the clients identified in this proceeding.

4.1.9 Any periods during which Respondent is not in active practice in the state of Washington for at least twenty (20) hours per week shall not count towards the



reduction of the term of this Order. Respondent shall inform the Board in writing of any such periods within thirty (30) days of commencement and cessation of the period.

4.1.10 Respondent shall not supervise or direct the training of persons entering the mental health fields. This shall include, but is not limited to, interns and postdoctoral programs.

4.2 Within ten (10) days of the effective date of this Order, Respondent shall thoroughly complete the attached Healthcare Integrity and Protection Data Bank Reporting Form (Section 1128 of the Social Security Act) and return it to the Department of Health, Legal Unit, P.O. Box 47869, Olympia, WA 98504-7869.

4.3 Respondent shall obey all federal, state, and local laws and all administrative rules governing the practice of the profession in Washington.

4.4 Respondent shall assume all costs of complying with this Agreed Order.

4.5 If Respondent violates any provision of this Agreed Order in any respect, the Board may take further action against Respondent's license.

4.6 Respondent shall inform the Board in writing of changes in her residential and business addresses within thirty (30) days of such change.

4.7 In the event that Respondent should leave Washington to reside or to practice outside the state, Respondent must notify the Board in writing of the dates of departure and return and the destination within thirty (30) days of the departure or return. Periods of residency or practice outside Washington will not apply to the reduction of the term of this Order. Respondent agrees that the Board may communicate with the licensing authority in any other jurisdiction.

4.8 Respondent may petition for modification of this Order or reinstatement at such time as she has completed five (5) years of supervised practice in the state of Washington. The Board may impose such conditions as it then determines appropriate.

I, LAURA S. BROWN, Ph.D., Respondent, certify that I have read this Stipulated Findings of Fact, Conclusions of Law, and Agreed Order in its entirety; that my counsel of record, if any, has fully explained the legal significance and consequence of it; that I fully understand and agree to all of it; and that it may be presented to the Board without my appearance. If the Board accepts the Stipulated Findings of Fact, Conclusions of Law, and Agreed Order, I understand that I will receive a signed copy.

\_\_\_\_\_  
LAURA S. BROWN, Ph.D.  
Respondent

\_\_\_\_\_  
Date

\_\_\_\_\_  
JAMES E. LOBSENZ, WSBA # \_\_\_\_\_  
Attorney for Respondent

\_\_\_\_\_  
Date

//

//

**Section 5: ORDER**

The Examining Board of Psychology accepts and enters this Stipulated Findings of Fact, Conclusions of Law, and Agreed Order.

DATED: \_\_\_\_\_

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EXAMINING BOARD OF PSYCHOLOGY

\_\_\_\_\_  
Panel Chair

Presented by:

\_\_\_\_\_  
MARGARET J. GILBERT, WSBA #18913  
Department of Health Staff Attorney

\_\_\_\_\_  
Date


**FOR INTERNAL USE ONLY. INTERNAL TRACKING NUMBERS:**

**PROGRAM NO. 98-10-0004PY**

# REQUEST FOR TIMELINE EXTENSION

## Instructions:

1. Please Type or Print Clearly
2. Review HTTS Manual and applicable Policies to determine the appropriate Requesting level, Approval level and time limits for your Extension Request.
3. Be sure to attach a copy of the Case Summary Report to the Request **before** forwarding for approval.
4. Ensure that there is adequate time to process your Request prior to timelines running out.
5. Check **only one block** within the appropriate Step for "Reason for Extension".
6. Use commentary from Block VI-a of this form in the "Comments" box when entering the approved Extension on HTTS.
7. Keep the original form of the approved Extension Request with the case file; send a copy of the completed approved form – with Case Summary Report – to the Operations and Support Services Office.

<b>I. CASE INFORMATION</b>			
Health Unit/Program: Unit 7 / Psychology		Case # 99-02-0006PY	Docket #: (If Applicable) 99-12-A-1016Py
Respondent Name (Last, First, MI) Brown, Laura S.	Step Start Date 11/21/00	Previous Extensions This Step 3	No. Days Requested 25
<b>II. REASON FOR DELAY</b> (Check the current Step, and the reason for the Delay)			
<input type="checkbox"/> Initial Assessment <input type="checkbox"/> BMA - Board/Commission Member Availability <input type="checkbox"/> OTR - Other <input type="checkbox"/> KPA - Key Personnel not Available	<input type="checkbox"/> Investigation <input type="checkbox"/> MAI - Multiple Agency Involvement <input type="checkbox"/> ICC - Inter-related Concurrent Cases <input type="checkbox"/> KPA - Key Personnel not Available <input type="checkbox"/> RAI - Records Availability Issue <input type="checkbox"/> OER - Outside Expert Review <input type="checkbox"/> OTR - Other	<input checked="" type="checkbox"/> Case Disposition <input type="checkbox"/> OER - Outside Expert Review <input type="checkbox"/> ICC - Inter-related Concurrent Cases <input checked="" type="checkbox"/> KPA - Key Personnel not Available <input type="checkbox"/> BMA - Board/Commission Member not Available <input type="checkbox"/> OTR - Other	<input type="checkbox"/> Adjudication (SOA) <input type="checkbox"/> DPC - Due Process Continuance <input type="checkbox"/> KPA - Key Personnel Availability <input type="checkbox"/> CCC - Conflicting Concurrent Cases <input type="checkbox"/> OTR - Other
<b>III. JUSTIFICATION FOR EXTENSION REQUEST:</b> (All items must be addressed)			
a. What is the cause of the delay? Multiple extension requests for continuance of hearing. Second Amended SOC returned from AAG on November 16, 2001. Case currently negative 15 days.			
b. What is the workplan to complete this Step (include dates for deliverables)? Need extension to bring case current and time to serve SOC.			
c. Other factors the Approving Authority should consider?			
<b>IV. REQUESTOR AUTHENTICATION:</b> (Name and authorization of person requesting the extension)			
 Sonja Craddock NAME OF REQUESTOR	Legal Secretary III TITLE/DUTY POSITION OF REQUESTOR	ED's Initials (If Applicable)	11/21/01 DATE

22

☐ **Good Cause Not Demonstrated – Extension Not Granted**

BROWN, LAURA 98100004PY SEGMENT 001 PAGE 57



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 11/20/2001 4:43:13 PM

Page 2 of 2

Printed By SCraddock 11/20/2001 4:43:17 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 99-02-0006

Description: Unprof - Questionable Conduct

Docket #: 99-12-A-1016 PY

Date Opened: 02/25/1999

Date Closed:

Total Days As of 11/20/2001: 999

Current Step = Adjudication Process

Step Name	Step Start	Step End	Step Due	Auth Days	Extend Days	Days Used	Days Remain	Next Step
Intake/Assess	02/25/1999	03/08/1999	03/18/1999	21	0	11	10	Investigation
Investigation	03/08/1999	02/23/2000	05/18/2000	170	267	352	85	Case Disposition
Case Disposition	02/23/2000	10/10/2000	10/10/2000	140	90	230	0	SOC-Receive Answer
SOC-Receive Answer	10/10/2000	10/30/2000	10/30/2000	20	0	20	0	Produce Sched Order
Produce Sched Order	11/09/2000	11/21/2000	12/09/2000	30	0	12	18	Adjudication Process
	10/30/2000	11/02/2000	11/29/2000	30	0	3	27	Adjudication Process
Produce Sched Order Sub Total					0	15		
Adjudication Process	11/21/2000		11/06/2001	180	170	364	-14	
	11/02/2000	11/09/2000	05/01/2001	180	0	7	173	Produce Sched Order
Adjudication Process Sub Total					170	371		



Christine O. Gregoire

# ATTORNEY GENERAL OF WASHINGTON

1125 Washington Street SE • PO Box 40100 • Olympia WA 98504-0100

## MEMORANDUM

November 15, 2001

TO: Janice K. Boden, Program Manager  
FROM: Robert C. Hargreaves, Assistant Attorney General  
SUBJECT: **Laura S. Brown, Ph.D.**

RECEIVED  
NOV 16 2001

Attached in the above-entitled matter is the Second Amended Statement of Charges.

T/L expired on  
11/6 -  
need ext

3 ext  
20 days  
8/22/01  
OFS cont  
8/30/01

Margaret

4/24/01

**L. Brown Sanctions**Here are my comments  
Sorry for the delay

Joanne

Based on the preceding Stipulated Facts and Conclusions of Law, Respondent agrees to entry of the following Agreed Order:

4.1 Respondent's license shall be and is **SUSPENDED** for at least five (5) years. The suspension shall be stayed subject to the following terms and conditions:

4.1.1 Respondent's practice shall be supervised by a psychiatrist approved in advance by the Board. The supervisor must be approved within sixty (60) days of the effective date of this Order. The stay shall commence at the time the supervisor is approved and only periods under supervision shall count towards reducing the term of suspension. The supervisor shall have experience in forensic psychology/psychiatry and at least ten (10) years in practice in the State of Washington and shall be identified and approved according to the Board's policy on supervisors and therapists.

4.1.1.1 The supervisor shall have access to all client files and shall meet with Respondent to review cases on a schedule set by the supervisor, but not less than one (1) hour per ten (10) hours of practice for the first year and one (1) hour per thirty (30) hours of practice thereafter.

4.1.1.2 Within thirty days of commencing supervision and subject to approval by the supervisor, Respondent shall develop definitions and limitations on consultation, evaluation, therapy, forensic, and other services and the resulting professional professional relationships. Appropriate disclosure forms shall be developed and approved by the supervisor. These disclosure forms



reference to  
must include the existence of this Order and information on how to  
obtain a copy of the Order from the Board. ✓

- 4.1.1.3 Respondent shall provide a copy of this Order to the supervisor prior to beginning the relationship. Respondent shall cause the supervisor to submit directly to the Board a written supervision plan at the beginning of the relationship. The plan shall be developed after an <sup>? who are the mandatory participants?</sup> initial meeting with representative(s) of the Board to set expectations and responsibilities. The plan shall include supervision of practice, regular review of all client cases, educational activities, <sup>do we want to compel taping?</sup> audio and/or videotaping sessions, and other elements as determined by the supervisor. The plan shall also include regular face-to-face meetings with Respondent, weekly during the first year and <sup>at least</sup> monthly thereafter. The plan may be revised from time to time as determined by the supervisor, but must meet the requirements of this Order and must be submitted to the Board within fourteen (14) days of revision. The plan shall also include regular activity and progress reports directly from the supervisor to the Board. The activity and progress reports shall be due the first day of January, April, July, and October of each year. Respondent shall provide the supervisor access to all files, tapes of sessions, and all other materials and communications as determined by the <sup>supervisor</sup> mentor. Responsibility for adhering to the plan, ✓

including causing timely submission of activity and progress reports rests with Respondent.

4.1.2 Respondent shall maintain fully documented files on all clients seen and consulted for any and all professional services. Any and all telephone and e-mail communications with clients and others shall be documented and included in the files in addition to all other required documentation. Therapy files shall be maintained using a SOAP format and shall include a current diagnosis and treatment plan. The supervisor shall establish requirements and format for all other types of files.

4.1.3 Respondent shall limit e-mail communication with clients to arranging and confirming appointments.

4.1.3 Respondent's records shall be subject to random audits to be conducted by the <sup>[who is this?]</sup> Board's designee Respondent shall pay the costs of these audits.

4.1.4 Within ninety (90) days of the effective date of this Order, Respondent shall pay a fine of thirty thousand dollars (\$30,000.00). Five thousand dollars (\$5000.00) shall be paid within ninety days of the effective date of this Order and the remainder shall be paid according to a payment plan not exceeding five years and established with the Board. Payment shall be by certified or cashiers check, marked with the docket number of this proceeding and mailed to the Department of Health, Examining Board of Psychology, P.O. Box 1099, Olympia, WA 98507-1099.

4.1.5 Within sixty (60) days of the effective date of this Order, Respondent shall submit at her own expense to an evaluation by a psychiatrist approved in advance by the

Board according to the Board's policy on supervisors and treatment providers.

Respondent shall execute releases to permit the evaluator to communicate with all current and recent mental health professionals providing evaluation or therapy to Respondent. The evaluator shall complete the evaluation and submit a written report to the Board and to the supervisor within sixty (60) days of commencing the evaluation. If the evaluator recommends therapy, Respondent shall follow the

recommendations.

<sup>6</sup>  
4.1.5 Respondent shall enter or continue therapy with a psychologist or psychiatrist IF recommended, per 4.1.5 approved in advance by the Board. The treating provider shall have expertise in addressing boundary issues with mental health practitioners. The treating provider shall be furnished copies of the Statement of Charges and this Agreed Order. The treating provider shall submit quarterly written reports directly to the Board and to the supervisor describing Respondent's progress in therapy with particular attention to issues related to the events described in the Statement of Charges and Respondent's future management of these issues. Therapy shall occur on a schedule and for a duration to be determined by the treating provider, but therapy shall not cease until the treating provider certifies to the Board that Respondent has adequately addressed the relevant issues to a point that she is able to practice with reasonable safeguards for clients.

← 4.1.6 Respondent shall have no contact with any of the Clients identified in this proceeding.

<sup>8</sup>  
4.1.7 Any periods during which Respondent is not in active practice in the state of Washington for at least twenty (20) hours per week shall not count towards the

reduction of the term of this Order. Respondent shall inform the Board in writing of any such periods within thirty (30) days of commencement and cessation of the period.

9  
4.1.8 Respondent shall not supervise or direct the training of persons entering the mental health fields. This shall include but is not limited to <sup>practica</sup>interns and <sup>hips</sup>postdoctoral programs. ✓

4.2 Within ten (10) days of the effective date of this order, Respondent shall thoroughly complete the attached Healthcare Integrity and Protection Data Bank Reporting Form (Section 1128 of the Social Security Act) and return it to the Department of Health, Legal Unit, P.O. Box 47869, Olympia, WA 98504-7869.

4.3 Respondent shall obey all federal, state, and local laws and all administrative rules governing the practice of the profession in Washington.

4.4 Respondent shall assume all costs of complying with this Agreed Order.

4.5 If Respondent violates any provision of this Agreed Order in any respect, the Board may take further action against Respondent's license.

4.6 Respondent shall inform the Board in writing of changes in her residential and business addresses within thirty (30) days of such change.

4.7 In the event that Respondent should leave Washington to reside or to practice outside the state, Respondent must notify the Board in writing of the dates of departure and return and the destination within thirty (30) days of the departure or return. Periods of residency or practice outside Washington will not apply to the reduction of the term of this Order. Respondent agrees that the Board may communicate with the licensing authority in any other jurisdiction.

4.8 Respondent may petition for modification of this Order or reinstatement at such time as she has completed five (5) years of supervised practice in the state of Washington. The Board may impose such conditions as it then determines appropriate.

**WAYNE L. LANNING**  
Internet=wl@okstate.edu

**OFFICE ADDRESS:**

Office of Graduate Studies and Research  
College of Education  
Oklahoma State University  
Stillwater, Ok 74078  
405/744-8976 office  
405/744-6399 fax

**EDUCATION**

**Ed.D. 1970**            **Western Michigan University, Kalamazoo, Michigan**  
Major areas: Educational Leadership and Counselor Education

**M.A. 1964**            **Michigan State University, East Lansing, Michigan**  
Major Areas: Rehabilitation Counseling and School Counseling

**B.A. 1962**            **Calvin College, Grand Rapids, Michigan**  
Majors: Psychology and Mathematics  
-Secondary Teaching Certificate

**PROFESSIONAL EXPERIENCE**

**OKLAHOMA STATE UNIVERSITY**

**College of Education**

**Associate Dean for Graduate Studies and Research, 1999-present**

- COE Director of Research
- COE Graduate Records Office

**UNIVERSITY AND COMMUNITY COLLEGE SYSTEM OF NEVADA**

**Associate with Vice-Chancellor for Academic and Student Affairs, 1998-1999**

- teacher education planning
- articulation and transfer
- teaching excellence initiative

**UNIVERSITY OF NEVADA, LAS VEGAS**

**Professor, 1989-1999**

**Department Chairman, July 1989 - August 1994**

Department of Counseling and Educational Psychology, College of Education

After reorganization for the last three years the Department of Counseling was housed in the College of Urban Affairs

- Administration and leadership of a department of 18 faculty members in the areas of marriage and family counseling, rehabilitation counseling, community agency counseling, school counseling, educational psychology, and foundations
- Graduate program development and implementation
- On leave Summer and Fall 1994 to study the use of computers and technology in education and counseling.
- Teaching Areas:
  - Ethics and Professional Decision-Making
  - Introduction to Counseling
  - Counseling Skills for Teachers
  - Internship in Counseling
  - Computers and Technology in Counseling
- Committees:
  - College of Education Advisory Committee
  - College Tenure, Merit, Promotion Committee
  - College Curriculum Committee, chair
  - College Graduate Curriculum Committee
  - University Sabbatical Leave Committee
  - University Academic Ethics Committee
  - University Intercollegiate Athletic Council- Chair, 1995-present
  - University/School District Partnership Committee
  - University Athletic Academic Advising Committee
  - University Faculty Travel Committee
  - University NCAA recertification Steering Committee
  - University NCAA legislative review committee

## **UNIVERSITY OF WYOMING**

**Professor, 1979 - 1989**

**Department Head, July 1983 – August 1989**

**Department of Counselor Education, College of Education**

- Administration and leadership for a department of four faculty members in the area of counselor education
- Graduate program advising and doctoral dissertation direction
- Teaching Areas:
  - Ethics and Professional Issues in Counseling
  - Doctoral Practicum in Counseling
  - Practicum in Counseling Supervision
  - Psychological Aspects of Coaching
  - Research in Counseling
  - Fundamentals of Counseling

Theories of Counseling  
 Practicum in College Teaching  
 Seminars in Counseling

- Committees: College Graduate Committee  
 Merit Policy Committee  
 Faculty Development Committee  
 Department Heads Committee  
 University Graduate Committee  
 University Academic Planning Committee  
 Faculty Senate  
 Faculty Senate Executive Committee  
 University Budget Committee

#### **UNIVERSITY OF HAWAII**

**Visiting Professor of Education**, August 1987 - June 1988 (*sabbatical leave*)  
 College of Education

- Sabbatical study of philosophies and ethics in Eastern and Western cultures

#### **INDIANA UNIVERSITY**

**Associate Professor**, August 1970 - August 1979  
 Department of Counseling and Guidance, School of Education

- Program Advising
- Doctoral Student Committees
- Doctoral Dissertation Direction
- Teaching Areas: Research Design  
 Practicum and Internship  
 Testing and Appraisal  
 Counseling Techniques and Theories  
 Supervision  
 Consultation  
 Career Development

**Coordinator**, 1976-1979

Indiana University's Annual Two-Week Program in Hawaii  
 Department of Counseling and Guidance

**Counseling Psychologist and Assistant Director**, 1970-1979  
 University Counseling Center



- Primary responsibility for doctoral training program
- Individual and group counseling
- Consultation with residence hall personnel, faculty, staff, administration, and athletic department
- Supervision of doctoral interns
- Individual and instructional research
- Development of consultation model
- Development of career programs
- Administration

### **BOSTON UNIVERSITY**

**Adjunct Associate Professor of Education, September 1977 - August 1978**  
Overseas Program, Europe

- Teaching Areas: Research Methods in Education  
Clinical Practice in Counseling  
Counseling: Philosophy, Theory and Practice  
Seminar in Counseling Psychology

### **PRIVATE PRACTICE**

Bloomington, Indiana, 1971 - 1980 (*part-time*)

- Individual, marriage, family, and career counseling

### **HOLLAND CHRISTIAN HIGH SCHOOL, Holland, Michigan**

**School Counselor and Teacher, August 1964 - June 1968**

## **PROFESSIONAL PRODUCTIVITY**

Lanning, W. Uses of technology in counseling and counselor education (in preparation for an online journal)

Lanning, W. (revised 2000) A Counselor Education Web page  
<http://home.okstate.edu/homepages.nsf/toc/counselor-ed>

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Lanning, W & Toye, P. (1993). Counseling Athletes in Higher Education. In Kirk W., & Kirk, S. (Eds.), Student Athletes: Shattering the Myths and Sharing the Realities (pp. 61-70). Washington, D.C.: American Counseling Association.

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Warren, J. & Lanning, W. (1992). Sex role beliefs, control, and social isolation of battered vs. non-battered women. Journal of Family Violence, 7, 1-8.

Carey, J. & Lanning, W. (1991). Virus like ideas: The role of counselors in the ecology of the ideosphere. Counseling and Values, 35, 232-236.

Lanning, W. (1990). An educator/practitioner model for counselor education doctoral programs. Counselor Education and Supervision, 30, 163-169.

Toye, P. & Lanning, W. (1989). An investigation of the relationship between dependency and specific sport participation, category of sport, and gender in college athletics. Academic Athletic Journal, Fall, 6-16.

Freeman, B. & Lanning, W. (1989). A multivariate analysis of the relationship between social power motivation and personality characteristics in college students. Journal of College Student Development, 30, 522-527.

Freeman, B. & Lanning, W. (1989). A factorial validity study of the Social Orientation Inventory. Psychological Reports, 64, 1119-1123.

Lanning, W. (1988). CACREP: An elite alternative to elitism?? Counselor Education and Supervision, 27, (4), 295-297.

Lanning, W. & Iverson, K. (1988). A study of the relation between mitral valve prolapse and personality characteristics. Journal of American College Health, 36, (4), 223-225.

Lanning, W. & Carey, J. (1987). Systematic termination in counseling. Counselor Education and Supervision, 27, (2), 168-173.

Carey, J. & Lanning, W. (1986). The evolution of cognitive behavioral counseling. Texas Tech Journal of Education, 13, 153-160.

Lanning, W. (1985). Development of the Supervision Emphasis Rating Form (SERF). Counselor Education and Supervision, 25, 191-196.

Lanning, W. (1985). A National ACES Convention. ACES Access, 44, (1), 7.

Warren, J. & Lanning, W. (1985). High school students' attitudes toward non-traditional careers: Some new information. Wyoming Personnel and Guidance Journal, 35, 18-21.

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Lanning, W. & Hisanaga, B. (1983). A study of the relation between the reduction of competition anxiety and the increase in athletic performance. International Journal of Sport Psychology, 14, (4), 219-227.

Lanning, W. & Owen, H. (1982). The effects of three treatment methods upon anxiety and inappropriate attentional style among high school athletes. International Journal of Sport Psychology, 3, (3), 154-162.

Warren, J. & Lanning, W. (1982). Biorhythm: Its relationship to football injuries. Journal of Sport Behavior, 5, 132-138.

Lanning, W. (1982). The privileged few: Special counseling needs of athletes. Journal of Sport Psychology, 4, 23-25.

Lanning, W. (1980). Applied psychology in major college athletics. In R. M. Suinn (Ed.), Psychology in Sports: Methods and Applications (pp. 362-368). Minneapolis, Minnesota: Burgess Publishing.

Lanning, W. (1979). Coach and athlete personality interaction: A critical variable in athletic success. Journal of Sport Psychology, 1, 262-267.

Lemons, S. & Lanning, W. (1979). Value system similarity and the supervisory relationship in counselor training. Counselor Education and Supervision, 19, 13-19.

Lanning, W. (1977). Factors related to college student persistence and withdrawal. National Association of Student Personnel Administrators Journal, 15, 34-38.

Lanning, W. (1977). Competition and anxiety management. Track and Field Quarterly Review, 77, (2), 37-38.

Glogowski, D. & Lanning, W. (1976). The relationship among age category, curriculum selected and work values for women in a community college. Vocational Guidance Quarterly, 25, 119-125.

Lanning, W. & El-Shamy, S. (1976). A task analytic approach to the identification of relevant appraisal competencies with a counselor center context. In R. Froehle & A. Brown (Eds.), A Collaborative Approach to Competence Based Counselor Education. Bloomington, Indiana: Indiana University.

Kurpius, D. & Lanning, W. (Eds.). (1975). Psychoeducational Consultation: Conference Proceedings. Bloomington, Indiana: The Midwest Center/Satellite Consortium.

Lanning, W. (1975). Consulting within the university. In D.J. Kurpius and W. Lanning (Eds.), Psychoeducational Consultation: Conference Proceedings. Bloomington, Indiana: The Midwest Center/Satellite Consortium.

Lanning, W. (1974). An expanded view of consultation activities for college and university counseling centers. Journal of College Student Personnel, 15, 171-176.

Lanning, W. & Lemons, S. (1974). Another look at the factor structure of the Barrett-Lennard relationship inventory. Measurement and Evaluation in Guidance, 6, 228-231.

Lanning, W. (1971). A study of the relation between group and individual counseling supervision and three relationship measures. Journal of Counseling Psychology, 18, 401-406.

Lanning, W., et. al. (1970). An investigation of levels of dogmatism of corporate managers and school administrators. Management Systems Programs. Western Michigan University: School of Business.

## GRANTS

Center for the Application of Substance Abuse Technologies (CASAT), 1998-1999  
Develop undergraduate minor in addictions for various majors at the university.

Deliver addictions courses via compressed video and the Internet, \$29,000.00

**UNLV Planning Initiative Award 1997-98**

Develop and deliver Addictions courses in conjunction with the University of Nevada, Reno using distance education methods, \$9500.00

**Addictions Technology Transfer Center (ATTC) 1996-97;1997-98**

Develop Addictions emphasis within the Community Counseling program at UNLV in conjunction with UNR, \$17,300.00

**Carl D. Perkins Act: Counseling and Guidance Inservice Project, 1989-90**

Training counselors in computer-based career counseling and vocational decision making: \$11,372.00

**Carl D. Perkins Act: Counseling and Guidance Inservice Project, 1986-87**

Training counselors and teachers in sex equity and career development in the schools: \$18,066.00

**CONFERENCE PRESENTATIONS AND INVITED ADDRESSES**

October, 2000, **North Central Association for Counselor Education and Supervision**, Faith Issues and Counselor Education, Indianapolis.

March 2000, **American Counseling Association** Current Practices in Counseling and the Internet, Washington D.C.

March 2000, **American Counseling Association**, Cybercounseling in the Millennium: Challenges and Opportunities for all of us., Washington D.C.

October 1999, **Association for Counselor Education and Supervision**, Teaching Counseling Students about Online counseling: Issues, Methods, and Content, New Orleans

October, 1999, **Association for Counselor Education and Supervision**, Technology 2000: It's not Times Picayune, New Orleans

April 1999: **American Counseling Association**, Effective Uses of Technology in Counseling, San Diego, CA

November 1998: **Arkansas Counseling Association**, Uses of technology in Counseling and Counselor Education, Hot Springs, Arkansas (invited address)

January, 1998: **American Association of State Licensing Boards**, Philosophical, Ethical, and Legal Issues in Internet Counseling, Tucson, AZ.

November, 1997: **Illinois Counseling Association**, Counselors in Cyberspace: The future is now, Springfield, Illinois

April, 1997: **American Counseling Association**, Counselors in Cyberspace: Legal and Ethical Issues, Orlando

October 1996: **Association for Counselor Education and Supervision**, Switched on Counseling: Counselor Education for the 21st Century, Portland.

October 1995: **Rocky Mountain Association for Counselor Education and Supervision**, Effectively Dealing with the Area of Religion in Counseling and Counselor Education, Breckenridge, Colorado.

September 1994: **Rocky Mountain Association for Counselor Education and Supervision**, Training Master's level Counselors for Private Practice: Ethics and Implications, Jackson Hole, Wyoming.

April 1994: **American Counseling Association**, CORE vs. CACREP: Cooperation or Competition?, Minneapolis.

October 1993: **Rocky Mountain Association for Counselor Education and Supervision**, AMHCA Competence Study: Implications for Educators, Breckenridge, Colorado.

March 1993: **American Counseling Association**, ACES Strategic Plan for the Future, adopted by executive committee and delegate assembly, Atlanta.

September 1992: **Association for Counselor Education and Supervision**, national conference presentations, San Antonio.

- Professional and Ethical Issues in Practicum Supervision
- Possible Models for Doctoral Programs in Counselor Education
- Revisiting CACREP Standards for Counselor Education: A Student Review (*chair*)
- AA and the 12 step Program: Should We, Did We, Can We Incorporate it into Counselor Education?

March 1992: **American Association for Counseling and Development**, Baltimore.

- Ethical Issues and Professional Practices in Practicum Instruction
- Building Societal Excellence Through Helping the Wounded Healers

November 1991: **Western Association for Counselor Education and Supervision**, Professional Practices and Ethical Issues in Practicum Instruction, San Diego.

September 1991: **Veterans Administration Domiciliary Care Conference**, Models for Communication and Change in the Helping Professions, Orlando.

**April 1991: American Association for Counseling and Development, Reno, Nevada.**

- **Future Directions for Counselor Education Doctoral Programs**
- **Developmental Wellness vs. DSM III-R: Antithesis to Synthesis**

**November 1990: Western Association for Counselor Education and Supervision, CACREP Standards Revision: A Workshop, Seattle.**

**October 1991: Rocky Mountain Association for Counselor Education and Supervision, CACREP Standards Revision: A Workshop, Breckenridge, Colorado.**

**November 1990: Western Association for Counselor Education and Supervision, Ethical and Professional Practices in the Group Counseling Curriculum, Seattle.**

**September 1990: Veterans Administration Domiciliary Chiefs Conference, Ethical Issues Related to Patient Care, Tampa.**

**March 1990: Employee Assistance Professional Association, Ethics and the Law for E.A.P. Professionals, Las Vegas.**

**September 1989: Rocky Mountain Association for Counselor Education and Supervision, Practical and Ethical Issues in Training Counselors, Jackson Hole, Wyoming.**

**March 1989: American Association for Counseling and Development, The Core Course Content in Counselor Preparation: Should We Change It?, Boston.**

**October 1988: Association for Counselor Education and Supervision, Developing an Ethical Framework in Supervision, Saint Louis.**

**May 1988: Hawaiian Islands Athletic Directors Conference, Increasing Interpersonal Effectiveness in Athletics, Kauai, Hawaii.**

**December 1988: Hawaii Invitational Swim Meet Coaches Clinic, Selecting and Using a Sport Psychologist in an Athletic Program, Honolulu.**

**December 1987: Hawaii Psychological Association, Symposium on Contributions of Sport Psychology to Science and Practice, Honolulu.**

**October 1987: Hawaii Association for Health, Physical Education and Recreation, Invited address on Arousal and Motivation in Athletics, Honolulu.**

**April 1987: American Association for Counseling and Development, Supervision Strategies to Create Movement, New Orleans.**



**November 1986: Banner Associates Annual Stockholders Meeting, Identification and Management of Interpersonal Stress, Laramie, Wyoming.**

**June 1986: Conference on Supervision in the Human Services, Assessing Emphasis Areas in Supervision, Laramie, Wyoming.**

**April 1986: American Association for Counseling and Development, Assessing the Emphasis with a Trainee in Counseling Supervision, Los Angeles.**

**May 1985: Lyman, Wyoming, School District, Invited speaker for the Athletic Banquet.**

**April 1985: American Educational Research Association, The Revised Supervisor Emphasis Rating Scale: New Analysis, Chicago.**

**April 1984: American Educational Research Association, Supervisor Focus Rating Form and Career Attitudes in High School Students, New Orleans.**

**October 1983: Northern Rocky Mountain Educational Research Association, Research in Counseling, Jackson Hole, Wyoming.**

**April 1983: American Educational Research Association, Competition Anxiety and Performance in Athletes, Montreal.**

**November 1982: Mid-South Educational Research Association, Treatment Methods for the Reduction of Anxiety Among Athletes, New Orleans.**

**August 1982: Wyoming High School Coaches Association All Sports Clinic, Psychological Influences Upon Athletic Performances, Laramie, Wyoming.**

**March 1982: American Personnel and Guidance Association, The Impact of N.D.E.A. upon Counselor Education Today, Detroit.**

**November 1981: Wyoming Alliance for Health, Physical Education, Recreation and Dance, Invited address on Coach and Athlete Personality Interaction, Rock Springs, Wyoming.**

**October 1981: Rocky Mountain Educational Research Association, The Effects of Three Treatment Methods upon Anxiety and Inappropriate Attentional Style in High School Athletes, Dallas.**

**August 1982: Wyoming High School Coaches Association All Sports Clinic, Invited address on Psychological Influences upon Athletic Performances, Laramie, Wyoming.**

**July 1981: Parallax Sports Basketball Officials Clinic. Invited address on Personality Characteristics as They Affect Referee Behavior, Laramie, Wyoming.**



**April 1981: American Personnel and Guidance Association, Training Counselors to Work with Athletes, St. Louis.**

**November 1980: Wyoming Personnel and Guidance Association, The Special Counseling Needs of Athletes, Casper, Wyoming.**

**October 1980: Wyoming Coaches Association, Invited workshop with coaches on Psychological Aspects of Coaching, Rock Springs, Wyoming.**

**April 1980: Conference on Nutrition and the Athlete. Invited address on Coach and Athlete Personality Interactions, Casper, Wyoming.**

**March 1979: Big Ten Counseling Centers Conference, Consultation and Counseling with Coaches and Athletes, Bloomington, Indiana.**

**February 1979: Mason/Dixon Games Coaches Clinic, Application of Sports Psychology to Track and Field, Louisville, Kentucky.**

**1977: Workshop for Department of Defense Dependent School Coaches, Psychological Aspects of Athletic Competition, Ansbach, Germany.**

**1976: American Personnel and Guidance Association, The Development of Appraisal Competencies with a Counselor Education Program, Chicago.**

**1975-78: U.S. Olympic Track Team Development Clinic, Presentation on Stress Reduction and Anxiety Management, San Antonio.**

**1975: North Central Association for Counselor Education and Supervision, Consulting Within the University, Kansas City.**

**1974: North Central Association for Counselor Education and Supervision, Development of Competencies within a Counselor Education Program, Chicago.**

**1973: American College Personnel Association, Issues in Training, Cleveland.**

**1973: National Association of Christian School Administrators, Invited address on Affective Learning, Toronto.**

**1973: Midwest Christian School Teachers Association, Invited address on Affective Learning, Chicago.**

**1973: Michigan Association of Non-Public Schools, Invited address on Affective Learning, Grand Rapids, Michigan.**

## **PROFESSIONAL MEMBERSHIPS AND ACTIVITIES**

(Present and previous)

- **American Educational Research Association**
- **American Association of Colleges of Teacher Education**
- **National Board for Certified Counselors (NBCC)**
  - Board of Directors 1998-present
  - Executive Committee-2000-present
- **Northern Rocky Mountain Educational Research Association**
  - ☐ Initiated the creation and development of the organization
  - ☐ President, 1983-1984 and 1984-1985
- **American Counseling Association**
  - ☐ Member of Task Force for Community/Agency Training Standards
  - Member of Task Force on Counseling and Cyberspace
    - **Association of Counselor Education and Supervision**
      - Member of Task Force on International Counselor Education and Supervision
      - ☐ Member of Accreditation Standards Review Committee
      - ☐ Chair of Strategic Planning Committee, 1991-93
      - ☐ Member of Doctoral Programs Interest Network
      - ☐ Chair of subcommittee to develop models for doctoral programs
      - Member of Network on Technology in Counseling
    - **Association for Spiritual, Ethical, and Religious Values in Counseling**
- **Rocky Mountain Association of Counselor Education and Supervision**
  - ☐ President, 1984-85
- **North Central Association of Counselor Education and Supervision**
- **Nevada Counseling Association**

- **Oklahoma Association For Counselor Education and Supervision**
- **American Psychological Association**
  - Division 47 - Sport and Exercise Psychology
  - Division 17 - Counseling Psychology
    - Co-Chair of Committee on Continuing Education 1976-1977
    - Member of Education and Training Committee 1975-1977
    - Chair of Subcommittee for Inservice Training 1975-1976

**Editorial Boards:**

*Journal of Counseling and Development*, 1996-1999  
*Counselor Education and Supervision*, 1984-1996  
*Counseling and Values*, 1996-present  
*Vocational Guidance Quarterly*, 1976-1982  
*Journal of Technology in Counseling*, 1998-present (online journal)

**Manuscript Reviewer:**

1982-Present  
 Brooks/Cole Publishers  
 Longman Publishing  
 John Wiley and Sons  
 Houghton Mifflin Company  
 Merrill Publishing

**Licensed Psychologist:** Indiana

**Licensed Professional Counselor:** Wyoming

**CACREP Accreditation Consultant:**

- Have chaired and served on visitation teams for numerous programs

**Sport Psychology Consultant:**

- US Olympic Track and Field development, 1976
- Indiana Basketball (1977-1980)
- Wyoming Basketball (1980-1989)
- Wyoming Football (1987-1989)
- Wyoming Skiing (1983-1987) NCAA Champions
- Hawaii Women's Volleyball (1987-1988) NCAA Champions

- UNLV Women's Basketball (1990-1996)

**Institutional Representative:**

**Consortium on Belizian Educational Cooperation (COBEC)**

- Purpose of consortium is to improve the quality of education in Belize through partnerships and consultation.

### INTRO for Tom Nagy

Dr. Nagy is a Clinical Assistant Professor in the Department of Psychiatry in the Department of Psychiatry at Stanford University School of Medicine. He provides clinical supervision there and also teaches a seminar in ethics to the staff and students on the Psychology Service. He also serves as an Oral Commissioner for California's Board of Medical Quality Assurance.

Dr. Nagy was involved with the revision process of the American Psychological Association's Code of Ethics from 1986 to 1992. He chaired the APA Ethics Committee's original task force, and later served on the Revision Comments Subcommittee, which produced the 1992 edition of the Code. He also served on the APA Ethics committee for three years (1985-87), Chaired the Illinois Ethics Committee for four years, and served on California's Ethics Committee for 5 years

Tom is in independent practice in Palo Alto and consults nationally with psychologists, attorneys, educators, and consumers in the area of ethics, professional conduct, and other matters. In 1994 he coauthored *Ethics For Psychologists; A Commentary on the APA Ethics Code*, published by APA. His next book, *Ethics in Plain English--A Vernacular Rendering of the Psychology Ethics Code*, is being published by APA later this year.

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### General Experience in Psychological Ethics and Forensics

Current appointments: 1) Clinical assistant professor, Department of Psychiatry and Behavioral Sciences at Stanford University School of Medicine (Teach ethics seminars for the staff, supervise post-doctoral interns and provide consultation about ethics as needed to the department); 2) Staff psychologist, Complementary Medicine Clinic, Stanford University Hospital (part time); 3) Full time independent practice in psychology since 1977.

- 1) Served on American Psychological Association Ethics Committee for 3 years (1985-87); reviewed and adjudicated complaints, wrote formal opinions, etc. Also served on APA Ethics Committee's Appeals Board, reviewing decisions of the Ethics Committee that were appealed by complainers.
- 2) Served on and chaired the American Psychological Association Ethics Committee's Task Force that revised *The Ethical Principles of Psychologists and Code of Conduct* (1986-92).
- 3) Chaired the Illinois Psychological Association Ethics Committee for 4 years (1982-86). Recipient: IPA's *Special Award for Outstanding Contribution to the Profession of Psychology* (1986).
- 4) Served on the California Psychological Association Ethics Committee for 5 years (1987-92). Recipient: Santa Clara County Psychological Association's *Award for Significant Contributions to the Field of Psychology by a Psychologist* (1999)
- 5) Authored: 1) *Ethics for psychologists; a Commentary on the APA Ethics Code* (Washington: American Psychological Association, 1994); co-authors--Mathilda Canter, Bruce Bennett, and Stanley Jones.  
  
2) *Ethics in Plain English: An Illustrative Casebook for Psychologists* (Washington: American Psychological Association, 1999).  
  
Chapter: "Managed Health Care and the Ethics of Clinical Practice in Behavioral Medicine" in *Ethical and Legal Issues in the New Mental Health Marketplace*, Edited by Laurence Barnhill and Richard Small, Washington: American Psychological Association, 1998.  
  
Chapter: "Competence" in *The Integration of Ethics and the Law in Clinical Practice*, Edited by Steven Bucky, New York: Haworth Publishing Co. (in press).
- 6) Authored examination questions for the Psychology Licensing Exam (US and Canada); Professional Examination Service (NY) in collaboration with the American Association for State Psychological Boards (1998).
- 7) Serve as an Oral Commissioner for the California State Board of Medical Quality Assurance (Board of Psychology) (1992-present).

- 8) Routinely present ethics seminars, lectures, keynote speeches, etc. for universities, State and County Psychological Associations, and other professional associations and groups, including workshops awarding mandatory continuing education credits for psychologists (VA Hospitals, Kaiser system, regional Psychological associations, etc.).
- 9) Read and processed hundreds of ethics complaints over the past 20 years; wrote formal opinions for ethics committees for scores of complaints, and participated in informal inquiries, formal adjudications, and consultations about a broad array of questionable behavior on the part of psychologists, psychiatrists, social workers, marriage and family therapists, and other providers dealing with patients, graduate students, supervisees, other consumers of psychological services.
- 10) Served as expert witness for plaintiffs and defendants, and consultant to attorneys in a variety of civil suits re. psychological competence and other matters (1989-present).
- 11) Chair the Institutional Review Board of the Mental Research Institute of Palo Alto (1992-present)
- 12) Chaired the California Psychological Association's Task Force that reviewed the structure and function of the Ethics Committee, recommending formal changes (1998). Also, served on the CPA Task Force that reviewed the fairness of the California Board of Psychology's disciplinary process with complainees (2000).
14. Many media presentations involving professional ethical practice, including the following:
  - 1) Radio interview (NPR); was interviewed about the ethics of psychologists offering diagnostic impressions and consult with the media about Elian Gonzales and other figures in the news without having assessed the individuals in question (4/29/00).
  - 2) TV presentation (Bay TV, Cable ) "Psychologists on the Internet", (4/9/99).
  - 3) Radio presentation (North American Broadcasting Company) "Ethics of Psychological Services over the Internet", 1 hour interview (3/13/99).
  - 4) TV presentation (ZDBN, Cable TV) panel presentation on "On-line psychological services", (12/16 /98).
  - 5) Radio presentation (Voice of America); was interviewed about the topic "psychotherapy over the internet," (9/11/97).
  - 6) Radio presentation (Family News and Focus Syndicate, Denver); was interviewed about on-line mental health services (6/21/96).
  - 7) Radio presentation for *Voices in the Family* (WHYY, Philadelphia): "Professional Boundaries in Psychotherapy", 1 hour interview (4/12/95).
  - 8) Radio presentation, *The Morning Show*, (WOAI San Antonio); was interviewed on the subject of telephone therapy, as it pertained to the O.J. Simpson homicide investigation (5/12/94).
  - 9) TV presentation, *Sony Live* (CNN, Atlanta) invited presenter on the subject of *Confidentiality and Privileged Communication between mental health providers and their clients*, with particular reference to the O. J. Simpson homicide investigation (6/15/94).
  - 10) TV presentation, *The TODAY Show* ( NBC, New York); invited presenter on the topic "Telephone Psychotherapy", (12/3/92).

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E-mail: tnagy@kryptos.stanford.EDU

**Forensic Experience**

(1989 - present)

1. Charlotte Caudle v. Emanuel Hospital, et. al.  
WCAB No.: STK 59949/67700/New Filing Workers Compensation Appeals Board  
in and for the State of California  
(April, 1989) Retained by plaintiff; Deposition.
2. Medical Board of California v. Antonio Clementino, Ph.D.  
No. D-4724 (April, 1993) Retained by defendant; Expert opinion.
3. California Board of Behavioral Science Examiners v. Thomas Irish, Ph.D.  
No. M-71 (July, 1993) Retained by defendant; Expert opinion.
4. Ken Roach et. al. vs. The University of Utah et. al.  
Third Judicial District Court in and for Salt Lake County, State of Utah  
(January, 1994) Retained by plaintiff; Expert opinion.
5. Katherine Schwiderski et al. v. Judith Peterson, Ph.D., et al.  
Case No. 93-22918 (Consol.) 129<sup>th</sup> Judicial District Court of Harris County (Texas)  
(June, 1995) Retained by defendant; Expert opinion.
6. Joanne Welsh v. City and County of San Francisco; Anthony Ribiera  
Case No. C 93 03722 DI.J; US District Court for Northern District of California  
(October, 1995) Retained by defendant; Expert opinion and Deposition.
7. Karen Schauer v. Donna Shalala, EEOC #210-95-6276X, SSA-657-92, American Federation  
of Government Employees, Social Security Administration (Illinois)  
(April, 1996) Retained by plaintiff; Expert witness.
8. California Board of Psychology, Case No. X-14, Statement of Issues Against Thomas Irish,  
Ph.D. (June, 1996) Retained by defendant; Expert opinion.
9. Odelia Braun v. City and County of San Francisco  
(December, 1996) Retained by defendant; Consultant.
10. Veasy v. Jenkins Arbitration  
(August, 1996) Retained by plaintiff; Deposition.
11. California Board of Behavioral Science Examiners, Case No. MF-93-455  
(July, 1997) Retained by defendant; Consultant.
12. Bertolucci v. Ananda Church of God, et al., Case No. 390 230  
(October, 1997) Retained by defendant; Consultant.
13. Richard J. Perrillo, Ph.D. v. Robert J. Sbordone, Ph.D. Case No. 785553  
(March 1999) Superior Court of the State of California, County of Orange  
Retained by defendant; Deposition.



14. Cleveland, et. al., vs. City and County of San Francisco, Case No. 306979  
(March, 2001) Superior Court of the State of California, County of San Francisco  
Retained by plaintiff; Deposition (videotaped for use at trial).

15. *Many ethics and forensic consultations involving State Boards of Psychology Investigations, universities, hospitals, training institutions, credentialing bodies, professional psychological associations, group psychological practices, patient-therapist litigation, supervisor-supervisee complaints, graduate students, etc.*

Updated April, 2001

# ETHICS *for* PSYCHOLOGISTS

## A Commentary on the APA Ethics Code

*Mathilda B. Canter, Bruce E. Bennett, Stanley E. Jones, and Thomas F. Nagy*

This book is offered as a practical resource to help psychologists learn and apply the APA Ethical Principles of Psychologists and Code of Conduct.

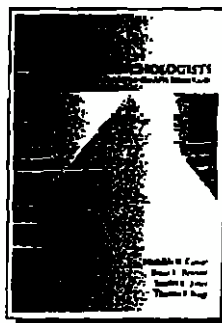
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The second part examines the 1992 revision of the Ethics Code in depth, including standards that are applicable to all psychologists and stan-

dards that may be more or less applicable to an individual psychologist depending on his or her professional role. The discussions in this section are conveniently organized in the same sequence as the standards from the APA Ethics Code. Each commentary provides additional descriptive material to address the questions that are likely to be raised by psychologists with regard to a given standard.

The last section puts the ethical principles in context by describing how psychology is regulated by professional organizations as well as local, state, and federal law.



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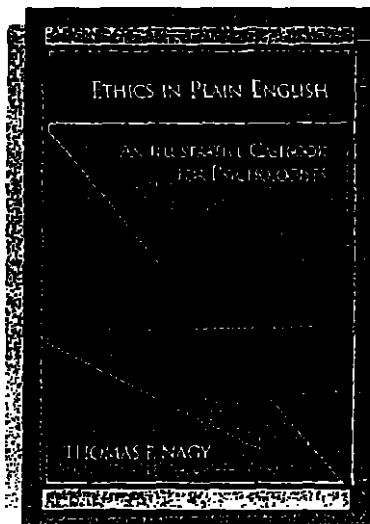
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Thomas F. Nagy

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AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION

**Thomas F. Nagy, Ph.D.****A. IDENTIFYING DATA**

**Mailing Address:** 555 Middlefield Road, Suite 212B  
Palo Alto, California 94301  
**Telephone:** (650) 324-1854  
**Pager:** (650) 526-0184  
**E-Mail:** Thomas@Nagy.com

**Birthdate:** September 6, 1945  
**Birthplace:** Newton, Massachusetts  
**Nationality:** U.S. Citizen

**B. COMPLETE ACADEMIC HISTORY**

**Colleges and Universities Attended:** Hamilton College, Clinton, New York, 1963 - 1967  
University of New Hampshire, Durham, 1967 - 1969  
University of Illinois, Urbana, 1969 - 1972

**Degrees with Dates Received:** A.B., Hamilton College, 1967  
Ed.M., University of New Hampshire, 1968  
Certificate of Advanced Graduate Study, University of New Hampshire, (30 graduate hours), 1969  
Ph.D., University of Illinois, 1972

**Fellowship & Residency Training:** 1969 - 1972 -- Psychologist, University High School, University of Illinois Curriculum Laboratory School, Urbana. Carried out individual and group counseling with adolescents, consulted with teachers and parents (individually and jointly), initiated an ongoing therapy group for teachers, supervised other counselors on staff, and carried out in-house research (20 hours/week).

1978 -- Internship in Marital and Sexual Dysfunction: Loyola University Medical Center Outpatient Psychiatry Department, Sexual Dysfunction Clinic, Domeena Renshaw, M.D., Director and Supervisor (6 months).

**Other Study or Research Appointments:**

1970 (summer) -- Research Assistant, Laboratory for Personality Analysis, Raymond B. Cattell, University of Illinois. Carried out research in food deprivation and human sexual behavior studies (interviewing and testing research participants).

1968 - 1969 -- Project Assistant, Department of Counselor Education, University of New Hampshire. Facilitated on-going sensitivity training groups for graduate students (two different groups weekly, 1 semester), library research, visits to N.H. Correctional Institutions to carry out psychological evaluation on inmates, and teaching counseling practicum.

## C. COMPLETE EMPLOYMENT RECORD

1974 - present Independent Practice of Psychology, teaching, supervision, and ethics and forensic consultation; Chicago (1974-86), Palo Alto, CA (1986-present).

1998 - present Staff, Complementary Medicine Clinic, Stanford University School of Medicine. Consulting with patients desiring hypnosis for broad array of medical and psychological symptoms (e.g., pain control, medical procedures, habit patterns)

1992 - present Clinical Assistant Professor, Stanford University School of Medicine, Dept. of Psychiatry and Behavioral Sciences. Teach post-doctoral fellows seminar on psychological ethics, clinical supervision, consult to Dept. on ethical/legal matters.

1996 Instructor, Stanford University School of Education, Course: *Ethical and Professional Issues for Psychologists*.

1988 - 1989 Psychological Assistant for Hugh Baras, Ph.D. (Palo Alto, CA)

1987 - 1988 Stanford University: Consulting Assistant Professor, Education Dept., Counseling Psychology Program. Individual/group supervision, seminar in Professional Ethics, and Case Conference.

1987 - 1989 Stanford University: Staff Psychologist in Dept. of Psychiatry, Behavioral Medicine Clinic. Responsible for all biofeedback interventions for psychosomatic disorders and clinical supervision of three interns. Also provided psychotherapy, and hypnosis, for other disorders--anxiety disorders, chemical dependency, eating disorders, and stress-related disorders, Axis II disorders, as well as services to inpatients on alcohol treatment unit and general medical units (G-2).

1987- 1988 Affiliated Psychologists, Inc., (Palo Alto and San Jose): Psychological Assistant. Individual/ marital therapy, stress-related disorders, employment screening for Police Department, Firefighters, and County Sheriff's Department, and general psychological services.

1986 - 1997 Western Graduate School of Psychology (Palo Alto): Adjunct Faculty. My duties included 1) Supervision of advanced doctoral students, 2) Teaching Professional Ethics and Law course and Case Conference course, and 3) Chairing Doctoral Dissertation Committees.

1984 - 1986 Mount Sinai Hospital (Chicago): Consultant. Taught seminars in Clinical Hypnosis to psychiatric residents.

1985 - 1989 Forest Institute for Professional Psychology (Chicago): Adjunct Faculty. Taught advanced doctoral students the following courses: 1) Hypnosis and 2) Professional Ethics and Standards.

1974- 1987 Independent Practice of Psychology (Evanston, Illinois); general psychological services, including individual psychotherapy, marital therapy, group therapy, hypnotherapy, pain management, and treatment for psychosomatic disorders. Adult and adolescent.

1979 - 1986 V.A. Medical Center (North Chicago, Illinois): Consultant. I taught seminars in 1) marital and sexual dysfunction, and 2) professional ethics for psychology and medical staff. I also taught marital and sexual dysfunction seminars on the following units: Post Traumatic Stress Disorder, Geriatric, Spinal Chord Injured, Oncology, Cardiac (also consultations to patient couples), Day Hospital, chronic inpatients and other groups.

- 1985 V. A. Medical Center at Hines (Illinois): Consultant. Presented seminars on Professional Ethics for psychology interns and staff.
- 1978 Loyola University of Chicago Child Guidance Center: Consultant and presented seminars Sexual Dysfunction, for Staff and interns (Psychology and Social Work).
- 1972 - 1978 Loyola University (Chicago): Full-Time staff psychologist, Student Counseling Services. Provided general psychological services to faculty, staff, and students, including individual psychiatry, marital counseling; and group therapy. Supervised counseling and clinical psychology interns, interdisciplinary staff research and development, and University committee work (Committee on Human Sexuality and Morality, among others.) I also taught one course in the Psychology Department (Introduction to Psychological Testing).
- 1972 (Summer) Student Life Center, Cleveland State University (Cleveland): Staff Psychologist. General psychological services, individual psychotherapy and testing of students, faculty, military personnel (funded by VA), and the general public.

#### **Predoctoral Employment**

- 1969 - 1972 University High School, University of Illinois, Curriculum Laboratory School (Urbana): Psychologist. Carried out individual and group counseling with adolescents, consulted with teachers and parents (individually and jointly), initiated an ongoing therapy group for teachers, supervised other counselors on staff, carried out in-house research.
- 1971 College of Education, University of Illinois (Urbana): Group Facilitator for drug abuse workshop. Moderated a group of mental health workers attending workshop on creating rehabilitation programs in their home settings.
- 1970 - 1971 College of Education, University of Illinois (Urbana): Instructor. Taught Counseling and Practicum and supervised Field Placements for doctoral students at Chanute Air Force Base Mental Health Center, Rantoul.
- 1970 (summer) Laboratory for Personality Analysis, Raymond B. Cattell, University of Illinois (Illinois): Research Assistant. Carried out research in food deprivation and human sexual behavior studies (interviewing and testing subjects).
- 1968 - 1969 Department of Counselor Education, University of New Hampshire: Project Assistant. Facilitated on-going sensitivity training groups for graduate students (two different groups weekly, one semester), library research, visits to New Hampshire Correctional Institutions to carry out inmates' psychological evaluation, and teaching counseling practicum.
- 1968 Chester Elementary School (Chester, New Hampshire): Intern. Individual and group counseling with pre adolescents, addressing parent groups, consulting with teachers, administrators, and parents (12 hours/week, 4 months).
- 1968 University of New Hampshire: Group Facilitator. Facilitated weekly basic encounter group counseling meetings with teacher trainees.
- 1965 - 1967 Hamilton College: Superintendent of the Student Union Building. Responsible for security and general administrative duties.

1963 - 1966 Children's Hospital Medical Center, (Boston), Clinical Hematologist. Duties included drawing venous and capillary blood samples from inpatients and outpatients (newborns to geriatrics) and performing lab analysis on blood, urine, and stools (summers).

#### D. PUBLIC SERVICE

1994 - 1997 Consultant for YBAL --pre-teen non-competitive baseball organization founded in Palo Alto and extending throughout California and other States.

1980 Presented Seminar: "Recognizing and Dealing with Stress in our Lives", St. Luke's Episcopal Church, Evanston, Illinois (3 sessions).

1976 - 1978 Board of Directors of Link, Inc., a community drug abuse education center for adults, located in Rogers Park (Chicago).

1970-1971 Gemini House, an adolescent drug abuse self-help treatment center (Urbana, Illinois): Consultant to Staff. Conducted weekly therapy group with staff and volunteers.

#### E. POST-DEGREE HONORS AND AWARDS, MEMBERSHIP IN PROFESSIONAL ASSOCIATIONS, ETC.

##### Awards and Honors

1999 Elected to fellow status in APA, through Division 42, Independent Practitioners.

1998 Elected to fellow status in the Society for Clinical and Experimental Hypnosis.

1998 Recipient, *Award for Significant Contributions to the Field of Psychology by a Psychologist*, Santa Clara County Psychological Association, (2/19/99).

1986 Recipient, *Special Award for Outstanding Contribution to the Profession of Psychology*, Illinois Psychological Association, Annual Convention (Chicago, 11/14/86).

##### Professional Association Activities

1998 Invited to write examination questions for the Professional Examination Service (Riverside, New York) in collaboration with the American Association for State Psychology Boards, to be integrated into the National Psychology Licensing Examination. Served as part of a 6-person US and 3-person Canadian task force to create examination questions pertaining to ethical and forensic matters; (Toronto, 6/18-6/19/98).

1998 Chair, California Psychological Association Task Force for review of structure and function of CPA Ethics Committee (5/98-10/98)

1997 Member, California Psychological Association Task Force for review of California Board of Psychology rules and procedures in conducting investigations of psychologists (8/97-6/98).

1997 - present Ethics Committee member, American Society of Clinical Hypnosis.



- 1995-1997 Co-chair, Training Workshops, Society for Clinical and Experimental Hypnosis. Organize and develop training workshops for the SCEH over a two-year period.
- 1992 Presented the *Ethical Principles of Psychologists and Code of Conduct* (1992) to the APA Council for its formal review and approval at the Annual Convention (along with other subcommittee members). The version was approved, culminating six years of work (Washington).
- 1992 - present Chair, Institutional Review Board of the Mental Research Institute (formerly, Human Subjects Protection Committee) (Palo Alto).
- 1992 - 1995 Consultant to Standards and Practice Task Force of the International Society for the Study of Multiple Personality Disorder and Dissociative Disorders.
- 1991 - present Member, Board of Directors, Mental Research Institute (Palo Alto).
- 1986 - 1989 Chair, Task Force for the Revision of *The Ethical Principles of Psychologists* (a subcommittee of the American Psychological Association Ethics Committee)
- 1990 - 1992 Member of *ad hoc* Revision Comments Subcommittee for *The Ethical Principles of Psychologists*.
- 1989 - 1990 Member, APA Publications and Communications Board, Task Force on Ethics in Publishing.
- 1988 - 1993 Member, Ethics Committee of California State Psychological Association.
- 1987 - 1990 Secretary, Bay Area Multiple Personality Disorder Society.
- 1987 - 1992 Member, Human Subjects Protection Committee of the Mental Research Institute (Palo Alto).
- 1986 - 1988 Member, Society for Clinical and Experimental Hypnosis Special Presidential Committee on Review of Health Care Professionals. Committee charge is to determine which health care providers should be eligible for training in hypnosis.
- 1986 - 1988 Member, Subcommittee for the Ethics Resource Center, APA Central Office library for position papers and educational documents published by the Ethics Committee.
- 1982 - 1986 Chair, Ethics Committee of Illinois Psychological Association.
- 1985 - 1987 Member, American Psychological Association Ethics Committee (3-year term).
- 1984 Member, American Psychological Association Ethics Committee Hearing Panel (3-year term). Served as Chair for one hearing (April, 1984). Resigned when elected to APA Ethics Committee.
- 1981 - 1982 President, Chicago Psychological Association.
- 1978 - 1979 Council Member, Chicago Psychological Association.
- 1978 - present Member and Teaching Faculty for workshops at annual conventions, Society for Clinical and Experimental Hypnosis.



**Membership in Professional Associations:**

American Psychological Association (Fellow, Div. 42)  
 American Psychology-Law Society  
 American Society of Clinical Hypnosis (Member Ethics Committee)  
 California Psychological Association (Member, Ethics Committee 1988-1993)  
 Illinois Psychological Association (Former Chair, Ethics Committee)  
 Santa Clara Psychological Association  
 Society for Clinical and Experimental Hypnosis (Fellow)

**F. PROFESSIONAL ACTIVITIES**

2001 Member, Ethics Committee, Stanford Hospital, Stanford, CA. (appointed 5/01)

1992-present Oral Commissioner, Psychology Examining Committee, California Board of Medical Quality Assurance. Administer oral examinations semi-annually to prospective licensees.

**Reviewer for Refereed Journals:**

1985 - 1991 *Professional Psychology: Research and Practice*

1987 -1992 *Dissociation* (Official Journal of the International Society for the Study of Multiple Personality and Dissociation)

1993 - 1994 *American Psychologist* (Official Journal of the American Psychological Association).

**Presentations, Workshops, Invited Lectures, etc.**

2001 Presenter, APA Annual Convention: "Does the 'e' in e-therapy also stand for ethics?" (San Francisco, 8/25/01).

2001 Presenter, APA Annual Convention: "Guidance from the APA Ethics Code about Posthumous Disclosures." (San Francisco, 8/24/01).

2001 Invited presentation: IVth European Conference on Family Therapy—Travelling through Time and Space. Group Hypnosis for Depression (Budapest, 6/28/01).

2001 Invited presentation: Hungarian Family Therapy Association. An Introduction to Hypnosis (1 1/2-hour workshop) (Budapest, 6/26/01).

2001 Faculty, American Society of Clinical Hypnosis Annual Conference; Chair of Ethics and Forensics seminar, and presenter (3 hrs); (Reno, 3/24/01).

2001 Presentation to Stanford University School of Medicine Pain Management Clinic: "Ethical, Legal, and professional risks in the treatment of chronic pain" (3/22/01).

2001 Workshop: "Update on Psychological Ethics, with actual malpractice cases." Mandatory Continuing Education Program for Psychologists (4 hrs., Contra Costa County Psychological Association, 1/19/01).

- 2000 Presentation to Stanford University School of Medicine Pain Management Clinic: "Applications of hypnosis in the treatment of chronic pain" (12/8/00).
- 2000 Workshop: "Professional Liability and Ethics: Case Studies." Mandatory Continuing Education Program for Psychologists (4 hrs., Berkeley, California Psychological Ass'n, 9/9/00).
- 2000 Invited presentation: "Hypnosis, cognitive-behavioral therapy, and pain management for cancer patients." Complementary Medicine Clinic, Stanford University School of Medicine (1 1/2 hr lecture, 7/12/00).
- 2000 Workshop: "Workshop: 'Update on Ethical and Legal Regulations for Psychologists.'" Mandatory Continuing Education Program for California Psychologists (3 hrs., VA Health Care System, Palo Alto, 5/23/00).
- 2000 Workshop: "Update on Ethical and Legal Regulations for Psychologists." Mandatory Continuing Education Program for California Psychologists (4 hrs., Kaiser Hospital Regional Center, Oakland, 5/13/00).
- 2000 Presenter, California Psychological Association Annual Convention: "Psychologists on the Internet: exploring possibilities and managing risks" (San Jose, 3/25/00).
- 2000 Grand Rounds Presentation: San Mateo County Dept. of Mental Health: "Hypnosis: an introduction to clinical application," (1 1/4 hr., San Mateo, 3/14/00).
- 2000 Workshop: "Psychology in Y2K: Ethical Compliance with the State of the Art," Mandatory Continuing Education for Oregon Psychologists, Sponsored by the Oregon Psychological Association (6 hrs., Portland, 3/3/00).
- 2000 Workshop: "Update on Ethical and Legal Regulations for Psychologists," Mandatory Continuing Education Program, Monterey Mental Health Network, (4 hrs., Monterey, 2/5/00).
- 1999 Presenter: Society for Clinical and Experimental Hypnosis Annual Conference, Scientific Session: "Hypnosis with Chronic Pain Patients and Their Post-termination Use of Self-Hypnosis - A Pilot Study," (New Orleans, 11/13/99).
- 1999 Faculty, Society for Clinical and Experimental Hypnosis Annual Conference; Chair of Ethics and Forensics seminar, and presenter (3 hrs); (New Orleans, 11/12/99 - 11/14/99).
- 1999 Invited presentation: "Hypnosis, cognitive-behavioral therapy, and pain management for cancer patients." Complementary Medicine Clinic, Stanford University School of Medicine (1 1/2 hr lecture, 10/13/99).
- 1999 Workshop: "Update on Ethical and Legal Regulations for Psychologists." Mandatory Continuing Education Program (MCEP) for California Psychologists (4 hrs., Kaiser Hospital Regional Center, Oakland, 9/25/99).
- 1999 Presenter, APA Annual Convention: "Psychologist in the Media and On-line--where is the line?" (Boston, 8/21/99).
- 1999 Presenter, APA Annual Convention: "Ethical Issues for Psychologists in Telehealth," (Boston, 8/22/99).
- 1999 Presenter, APA Annual Convention: "Work of State Ethics Committees--To Be Continued?" (Boston, 8/23/99).

- 1999 Keynote speaker, Continuing Education Workshop in Psychological Ethics, VA Medical Center of Palo Alto (2 hrs., 6/11/99).
- 1999 Faculty, American Psychiatric Association, one-day Workshop: "Hypnosis: Principles and Applications" (w/ J. Maldonado and D. Spiegel), (Washington, D.C., 6/16/99).
- 1999 Faculty, American Psychiatric Association, one-day Workshop: "Hypnosis in Psychiatry " (w/ J. Maldonado and D. Spiegel), (Washington, D.C., 6/19/99).
- 1999 Presenter, California Psychological Association Annual Convention: "Current ethical problems facing Psychologists on the Internet" (San Diego, 3/26/99).
- 1999 Invited presentation at Santa Clara University School of Law Keynote Conference, Second Annual Ethics Week, *Sanctity of Secrets: "Privacy and Confidentiality among Mental Health Professionals"* (3/10/99).
- 1999 Presentations to Stanford University School of Medicine Pain Management Clinic: "Ethical, Legal, and professional issues in the treatment of chronic pain" (2/29/99, 5/7/99).
- 1998 Presenter, APA Annual Convention: "Ethical Considerations for Psychologists using Current Technologies," (San Francisco, 8/15/98).
- 1998 Presenter, APA Annual Convention: "Ethical Problems in Offering Psychological Services Online," (San Francisco, 8/15/98).
- 1998 Chair, APA Annual Convention, Symposium: "The High Risk Model of Threat Perception: New Frontiers in Nursing, Psycho-spiritual Transformation, Somatization, Dreams, and Nightmare Recall," (San Francisco, 8/17/98).
- 1998 Discussant, APA Annual Convention, Session: "Professional Distress and Impairment--Data and Implications for Assistance Programs," (San Francisco, 8/17/98).
- 1998 Presenter, California Psychological Association Annual Convention: "Ethical Issues for Psychologists on the Internet" (Pasadena, 3/27/98).
- 1997 Presentations to Stanford University School of Medicine Pain Management Clinic: "Ethical, Legal, and professional issues in the treatment of chronic pain (12/12/97, 1/30/98, 1/8/98).
- 1997 Workshops Co-chair: Society for Clinical and Experimental Hypnosis, Annual Conference, (Washington, DC, 11/13/97 - 11/16/97).
- 1997 Presenter, APA Annual Convention: "Repressed Memory and Ethics--Caveat Emptor et Caveat Doctor" (Chicago, 8/15/97).
- 1997 Discussant, APA Annual Convention: "Computer-Assisted Psychotherapy: Diagnosis, Treatment, and Ethical Considerations" (Chicago, 8/17/97).
- 1997 Presenter, APA Annual Convention: "State Ethics Committees: Investigate or Educate?" (Chicago, 8/18/97).
- 1996 Workshops Co-chair: Society for Clinical and Experimental Hypnosis, Annual Conference, and teaching faculty for Workshop: Hypnotherapeutic Treatment of Chronic Pain (Tampa, 11/7/97 - 11/10/96).

- 1996            Presenter, APA Annual Convention: "Ethical Issues in the Managed Health Care Setting" (Toronto, 8/10/96).
- 1996            Invited Speaker, Educational Horizons Seminar. "Ethical Risks for Therapists Treating Dissociative Identity Disorder"; Continuing education workshop for psychologists (for credit) (San Jose, 6/1/96).
- 1996            Invited Presenter, San Diego Psychological Association Annual Convention: "Ethical Practice for Psychologists using Technology and the Media" (3 1/2 hour workshop) (5/4/96).
- 1996            Presenter, 27th Annual APA Midwinter Convention: "Ethical Guidelines in the Managed Healthcare Setting" (Scottsdale, 3/28/96 - 3/31/96).
- 1996            Workshop Faculty: American Academy of Pain Medicine Annual Convention: "Use of Hypnosis for Anaesthesiologists" (Tampa, 2/18/95).
- 1996            Faculty, University of California at San Diego Extension Program. Course: *Understanding and Applying the New APA Ethics Code*. (1/26/96 - 1/27/96).
- 1995            Keynote Speaker, Santa Clara County Psychological Association all day Ethics Workshop: "Repressed Memories" (10/21/95).
- 1995            Panel Presenter, Los Angeles County Psychological Association: "Psychology, Ethics, and Media's Technological Revolution: Challenges, Responsibilities, and Risks" (10/14/95).
- 1995            Invited Presentation, American Society for Reproductive Medicine: "Ethical Issues in Using Third Parties in Conception and Pregnancy" (Seattle, 10/9/95).
- 1995            Invited Radio Presentation for *Voices in the Family* (WHYY, Philadelphia): "Professional Boundaries in Psychotherapy" (1 hour interview) (4/12/95).
- 1995            Workshop Faculty: American Academy of Pain Medicine Annual Convention: "Use of Hypnosis for Anaesthesiologists" (Palm Springs, 2/18/95).
- 1994            Invited Presentation, Marin County Psychological Association: "Implications of the New APA Ethics Code on Clinical Practice" (5/14/94)
- 1994            Keynote Speaker, Santa Clara County Psychological Association One-Day Workshop on Professional Ethics: "Ethical Dilemmas: Can We Talk?" (5/7/94).
- 1994            Invited Presentation California School of Professional Psychology at San Diego, Panel presentation: "Ethical and Legal Implications of the new APA Ethics Code," (4/30/94).
- 1994            Faculty, San Francisco Academy of Hypnosis, 31<sup>st</sup> Annual Introductory Workshop for Physicians, Dentists and Psychologists: "Pain Management--Common Principles", (San Francisco, 3/6/94).
- 1994            Invited Speaker, Mid-Coast Dental Association: "Applications of Hypnosis to Dentistry". (Palo Alto, 1/20/94).
- 1994            Invited Speaker, Stanford University Medical Center Voluntary Clinical Faculty Presentation: Managing Managed Health Care--Avoiding Legal and Ethical Problems", (Palo Alto, 1/11/94).
- 1993            Faculty, Society for Clinical and Experimental Hypnosis, Annual Conference, 2-day Workshop. "Hypnosis in General Medicine and Surgery" (Chicago, 10/12/93 - 10/13/93).

- 1993 Invited presentation, Sacramento Psychological Association, Half-day workshop: "The New APA Ethics Code: What you need to know to protect your clients and yourself" (6/4/93).
- 1993 Faculty, California Psychological Association, Half-day workshop: "An Introduction to the New APA Ethical Principles of Psychologists and Code of Conduct" (San Francisco, 4/2/93).
- 1993 Invited speaker, Mid-Coast Psychological Association: "New Aspects of the APA Ethics Code" (Santa Cruz, 3/5/93).
- 1993 Invited presentation, San Diego Psychological Association. All-day workshop: "The New Ethics Code--Implications for Practitioners." Panel Presentation with Attorney Brandt Caudill and California Psychology Board Chair, Louis Jenkins (2/20/93).
- 1993 Invited presentation, California School of Professional Psychology at Alameda, Half-day workshop: "An Introduction to the New APA Ethical Principles and Code of Conduct" (2/13/93).
- 1993 Invited speaker, Contra Costa County Psychological Association: "New Aspects of the APA Ethics Code" (Lafayette, 1/29/93).
- 1992 Invited presentation: Seminar on Multiple Personality Disorder for the School of Social Work at Stanford University School of Medicine (Palo Alto, 11/19/92).
- 1992 Presenter, International Society of Multiple Personality and Dissociative Disorders, Annual Conference: "Ethical Issues in the Treatment of Multiple Personality Disorders" (Chicago, 11/14/92).
- 1992 Keynote Speaker, Santa Clara County Psychological Association All-day Ethics Workshop: "Introduction to the New APA Ethical Principles and Code of Conduct" (Santa Clara, 11/7/92).
- 1992 Faculty, Society for Clinical and Experimental Hypnosis, Annual Conference, 1-day Workshop. "Clinical Hypnosis: The Power of Words and Images" and "Advanced Hypnosis for Medicine and Surgery" (Washington, DC, 10/21/95 - 10/25/92).
- 1992 Presenter, APA Convention: "New Ethics Code or More Revisions?" Panel Presentation (2 hrs), (Washington, 8/14/92).
- 1992 Presented to the APA Council of Representatives details concerning the final proposals to the new Ethics Code and acceptance by the membership of APA (4 hours). This was an agenda item of the Council and was the last step in formal approval of the revised Code of Ethics (Washington, 8/16/93).
- 1992 Presenter, California Psychological Association Convention: "The New Ethical Principles of Psychologists--A Sword or a Shield?" (La Jolla, 3/20/92).
- 1991 Guest Lecturer, Pacific Graduate School of Psychology: "On Encountering Unethical Conduct among our Colleagues--Confronting, Bringing Complaints, and the Adjudication Process" (Palo Alto, 12/4/91).
- 1991 Invited Presentation, Orchard Hospital, Ben Joshel Memorial Series: "The New Ethics Code--Better Protection for Therapist and Patient" (Skokie, IL., 11/13/91).
- 1991 Co-chair, APA Convention Presentation: "The Revision of *The Ethical Principles of Psychologists: An Open Meeting*" (San Francisco, 8/18/91).

- 1991            Presenter, APA Convention: Discussant for panel presentation on "Student's Rights and Grievance Procedures in Academic Programs and Internships" (San Francisco, 8/16/91).
- 1990            Presenter, Association for the Advancement of Behavior Therapy, Annual Convention: "Revision of the *Ethical Principles of Psychologists*: Implications for Practitioners and Researchers" (San Francisco, 11/2/90).
- 1990            Faculty, Society for Clinical and Experimental Hypnosis, Annual Conference, 1-day Workshop, "Clinical Self-Hypnosis: The Power of Words and Images" (Tucson, 10/16/90 - 10/21/90).
- 1990            Presented Workshop (4 hours): Use of Hypnotherapy for Psychosomatic Disorders. Mental Research Institute (Palo Alto, 10/9/90).
- 1990            Presenter, APA Convention: "A Dialogue about Major Draft #13 of *The Ethical Principles of Psychologists*, with Mathilda Canter (Boston, 8/12/90).
- 1990            Presenter, Santa Clara County Psychological Association, All day Workshop--Ethical/Legal Issues in Clinical Practice, "APA Ethical Guideline Changes: Implications for Psychologists" (Santa Clara, 7/21/90).
- 1990            Presenter, American Parenting Association, "Stress Management for Child and Parent", (Palo Alto, 5/19/90).
- 1990            Presenter, Western Psychological Association, "Revision of *The Ethical Principles of Psychologists*: The Final Progress Report--Four Years Later" (Los Angeles, 4/27/90).
- 1990            Presenter, California State Psychological Association: "Revision of *The Ethical Principles of Psychologists*: The Final Progress Report--Four Years Later" (San Francisco, 3/2/90).
- 1990            Presenter, Peninsula Hospital Grand Rounds, "Therapy by Phone--Ethical and Clinical Issues," (Burlingame, 2/16/90).
- 1989            Faculty, Society for Clinical and Experimental Hypnosis, Annual Conference, Three-Day Workshop: Hypnosis in General Medicine and Surgery; 1) Sequelae of Awareness during Surgery and 2) Metaphors and "Organic Language" (St. Louis, 10/31/89 - 11/2/89).
- 1989            Presenter, Bay Area Convention--Psychotherapy in the 1990's: Emerging Trends; "Ethical Issues in the Marketing of Psychological Services" (Alameda, 10/28/89).
- 1989            Presenter, APA Convention: "Revision of *The Ethical Principles of Psychologists*: APA Task Force's Progress report--Three Years Later and Ready for Review" (New Orleans, 8/14/89).
- 1989            Presenter, California State Psychological Association Annual Convention: 1) "Boundaries of Competence: Training and Therapist Impairment," and 2) "A Progress Report on the New Ethics Code--Professional and Legal Implications" (San Francisco, 2/26/89).
- 1988            Invited presenter: Colloquium, Pacific Graduate School: "The New Ethics Code--professional and legal implications of the Current Revision" (Menlo Park, 11/21/88).
- 1988            Presenter, APA Convention: "Revision of *The Ethical Principles of Psychologists*: APA Task Force's Second Annual Progress Report" (Atlanta, 8/14/88).
- 1988            Presenter, California State Psychological Association Annual Convention: "The Well-Educated Consumer: Informing Clients and Protecting Providers" (San Diego, 2/27/88).



- 1987 Invited presentation, Stanford University Medical Center Pediatric Grand Rounds: "Biofeedback Applications in Pediatrics" (Palo Alto, 10/14/87).
- 1987 Presenter, International Society of Multiple Personality and Dissociative Disorders Annual Conference: "When the Therapist Leaves: Premature Termination and Patient Management" (Chicago, 11/14/87).
- 1987 Faculty, Society for Clinical and Experimental Hypnosis, Annual Conference, Three-Day Workshop: Psychotherapy--Intermediate Level (Los Angeles, 10/26/87).
- 1987 Presenter, APA Convention: "Ethical Aspects of Consumer Information and Informed Consent" (New York, 8/29/87).
- 1987 Presenter, APA Convention: "A Progress Report on the Revision of the *Ethical Principles*" (8/28/87).
- 1987 Participant, APA Convention: Ethics Committee Presentation: "Ethics and the Federal Trade Commission" (8/30/87).
- 1987 Presenter, California State Psychological Association Annual Convention: "Diagnosis of Multiple Personality Disorder by Use of a Patient Daily Log" (San Diego, 3/21/87).
- 1986 Chair, Illinois Psychological Association Annual Convention, Ethics Committee Panel: "Ethics in the 80's--Dual Roles, Confidentiality, and Forensic Psychology." Presented paper: "The Adjudication Process, Impaired Psychologists, and Guidelines for Avoiding Ethics Complaints" (Chicago, 11/13/86).
- 1986 Chair, Illinois Psychological Association Annual Convention, Ethics Committee Panel: "Media Psychology and Telephone Psychotherapy: Professional, Legal, and Ethical Aspects." Guest panelist: Milt Rosenberg, Ph.D., psychologist and talk-show host on WGN radio, Chicago (11/13/86).
- 1986 Faculty, Society for Clinical and Experimental Hypnosis, Annual Conference, 3-day workshop: Medical Hypnosis (Chicago, 9/23/86).
- 1986 Presenter, International Society of Multiple Personality and Dissociative Disorders Annual Conference: "Use of the Patient Log in Diagnosis and Treatment of MPD" (Chicago, 9/19/86).
- 1986 Chair, APA Convention: Seminar for Ethics Committee Chairpersons of State Psychological Associations (Washington, DC, 8/23/86).
- 1986 Presenter and author of the following two position papers of the American Psychological Association Ethics Committee at APA Conference: 1) The Ethics of Required Psychotherapy for Students, 2) Telephone Consultation Services by Psychologists (8/24/86).
- 1986 Participant, Subcommittee for Revision of *The Ethical Principles of Psychologists*, open meeting at APA Conference (8/24/86).
- 1986 Invited address (Old Orchard Hospital, Skokie, Illinois): "Professional Ethics and the Mental Health Specialist" (6/19/86).
- 1986 Invited address, Illinois Benedictine College: "Professional Ethics in Clinical Practice" (Lyle, 5/2/86).
- 1985 Participant: "A Mock Ethics Committee Meeting", APA Convention (Los Angeles, 8/85).

- 1985 Chair, Symposium on "Child Custody Evaluation", APA Convention, sponsored by APA Ethics Committee (8/85)
- 1984 Workshop Instructor, APA Convention: Division 30, Hypnosis (8/84).
- 1984 - 1985 Invited presentations to medical staff (Prucare, a Chicago-based HMO) on the subject of hypnosis: 1) "Applications of hypnotherapy in an HMO population--psychotherapy" (Mental Health Staff, 9/84) and 2) "Hypnosis and Stress-Related Disorders" (Internists and Family Practitioners, 7/85).
- 1984 Faculty, Society for Clinical and Experimental Hypnosis, Annual Conference, 3-day workshop: Psychotherapy and Medical Hypnosis (San Antonio, 10/22/84).
- 1982 Faculty, Society of Clinical and Experimental Hypnosis, Annual Conference, 3-day workshop: Hypnotherapy--Introductory and Intermediate levels (Indianapolis, 10/19/82).
- 1981 Presented Workshop on Human Sexual Dysfunction at Chicago Psychological Association Spring Conference (3 hours).
- 1980 Faculty, Society of Clinical and Experimental Hypnosis, Annual Conference, 3-day workshop: Medical Application--Introductory Level (Chicago, 10/7/80).

## G. RESEARCH AND PUBLICATIONS

### Published

#### Books:

- Cantor, Mathilda, Stan Jones, Bruce Bennett, and Thomas Nagy [equal authorship]: (1994) *Ethics for Psychologists: A Commentary on the APA Ethics Code*. Washington, DC American Psychological Association.
- Nagy, Thomas. *Ethics in Plain English: An Illustrative Casebook for Psychologists*. Washington, D.C.: APA Press. 1999

#### Chapters and Articles:

- Nagy, Thomas: Book Review, *Negotiating Consent in Psychotherapy*, by Patrick O'Neill (New York: New York University Press, 1998) in *Contemporary Psychology* (APA Review of Books), in press.
- Nagy, Thomas: Book Flier Comments for *Memory, Trauma Treatment, and the Law*, by Daniel Brown, Alan W. Schefflin, and D. Corydon Hammond, New York: W. W. Norton & Company, 1997.
- Nagy, Thomas: Book Review, *Healing the Divided Self*, by Maggie Phillips and Claire Frederick (New York: W. W. Norton & Co., 1995) in *International Journal of Clinical and Experimental Hypnosis*, July, 1996.
- Nagy, Thomas. "Competence," Chapter in *The Integration of Ethics and the Law in Clinical Practice*, Edited by Steven Bucky, New York: Plenum Publishing Corp., In Press.



- Nagy, Thomas. "Call to Action: Critical Education and training Needs on Ethical and Legal Issues in Psychological Telehealth", with Marlene Maheu and Joanne Callan, Chapter in *The Integration of Ethics and the Law in Clinical Practice*, Edited by Steven Bucky, New York: Plenum Publishing Corp., 1999 (in press).
- Nagy, Thomas. "Managed Health Care and the Ethics of Clinical Practice in Behavioral Medicine", Chapter in *Ethical and Legal Issues in the New Mental Health Marketplace*, Edited by Laurence Barnhill and Richard Small, Washington: American Psychological Association, 1998.
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- Nagy, Thomas. "Ethics and Technology in Psychological Services", *The National Psychologist*, Vol. 4, No. 5, , 1995.
- Nagy, Thomas. "Viewpoint--Managed Health Care", *The National Psychologist*, Vol. 3, No. 1, 1994.
- Nagy, Thomas. "Guidelines for Psychologists Working with Repressed Memories," *The National Psychologist*, Vol. 3, No. 4, 1994
- Nagy, Thomas. "Applying the New Ethics Code to Practice," *The National Psychologist*, Vol. 2, No. 5, 1993.
- American Psychological Association: *The Ethical Principles of Psychologists and Code of Conduct*. Contributing author to the final document, along with three other members on the Revision Comments Subcommittee of the APA Ethics Committee, in *The American Psychologist*, Vol. 47, No. 12, 1992.
- Nagy, Thomas. "Informed Consent." Chapter III in *Ethical Issues in Clinical Practice under Virginia Law*, by Mary Alice Fisher, 1991.
- Nagy, Thomas: "Ethical Principles and the Federal Trade Commission," *The Independent Practitioner* (Bulletin of APA Division 42) Vol. 11, No. 3, 1991.
- Nagy, Thomas: "Revision of the ethical Principles of Psychologists: The Final Progress Report--Four Years Later." *The Independent Practitioner*, Vol. 10, No. 4, 1990.
- American Psychological Association: *Casebook on Ethical Principles of Psychologists*. Contributing author with other APA Ethics Committee members. Washington: APA, 1987.
- Nagy, Thomas. "The Ethics of Required Psychotherapy for Students". Included in the 1987 "Annual Report from the APA Ethics Committee" in *The American Psychologist*, Vol. 42, No. 7.
- Nagy, Thomas. "Electronic Ethics." *The APA Monitor*, Vol. 18, No. 11, November, 1987.
- Goodman, Mitch and Thomas Nagy. *Stress, Sex, and Your Heart*. North Chicago: Veterans Administration Medical Center, 1986.
- Illinois Psychologist Newsletter* : Frequent articles in the "From The Ethics Committee" Column, which I initiated, 1982-86.
- Hebert, David and Thomas Nagy. *Counseling: Preparation, Supervision and Assessment*. New Hampshire Department of Education, Division of Vocational Rehabilitation, Concord, 1971.
- Nagy, T. and R. Boyd, "Experiential Groups for Teachers". *Pupil Personnel Services Journal*, 2, 1973, 36-42.

Pine, F., A. Boy, D. Hebert, J. Petroski, D. Webb, and T. Nagy. *A Survey and Evaluation of Rehabilitation Services in the New Hampshire County Correctional System. A report to the Governor of New Hampshire via the Vocational Rehabilitation Administration of the Department of HEW, 1969.*

*Position Paper for APA Ethics Committee:*

Nagy, Thomas. APA Ethics Committee Position Paper: "Does Your Software Match Your Hardware: Telephone Consultation Services by Psychologists". Ethics Resource Center, APA Ethics Office. This is an expanded version of the APA article cited above.

**Unpublished**

Nagy, T. "A Study of the Relationships Between Sensitivity, Social Distance, and Four Personality Traits among Counselor Trainees." Masters Thesis, University of New Hampshire, 1969.

Nagy, Thomas. "Premature Termination and Patient Management: When the Therapist Leaves".

Nagy, T. "University High School Student Profile." (Based on Student Life Questionnaire which I developed), *The Faculty Handbook*, University of Illinois Laboratory School, 1971.

Nagy, T. "Sensitivity Groups: Goals and Guidelines." Orientation to faculty experiential groups which I conducted at University High School, 1971.

Nagy, T. "The Relationship Between Therapists Level of Functioning and Change in Clients' Verbal Behavior and Quantifiable Anxiety Level." Doctoral Dissertation, University of Illinois, 1972.

**H. MEDIA PRESENTATIONS**

**Radio and Television**

- |                |   |
|----------------|---|
| 1987 - present | Various interviews with journalists on the subjects of psychological ethics, telephone psychotherapy, online psychological services, hypnosis, sex therapy, stress management, etc.: CBS TV, CNN TV, FOX TV, NBC TV, KQED Radio and TV, etc.          |
| 2000           | TV interview (PBS) for <i>Healthweek</i> , on topic of psychological services offered over the internet (9/15/00).  |
| 2000           | Radio interview (NPR); was interviewed about the ethics of psychologists offering diagnostic impressions and consult with the media about Elian Gonzales and other figures in the news without having assessed the individuals in question (4/29/00). |
| 1999           | Radio presentation (KQED, San Francisco) panel discussion about psychologists on the internet (network program: <i>Beyond Computers</i> , 10 minutes) (8/1/99)  |
| 1999           | Radio presentation (North American Broadcasting Company) "Ethics of Psychological Services over the Internet", 1 hour interview (3/13/99).  |

- 1998 TV presentation (ZDBN, Cable TV) panel presentation on "Online psychological services", for broadcast on 12/16/98 (11/18/98).
- 1997 Radio presentation (Voice of America); was interviewed about the topic "psychotherapy over the internet," for broadcast on 9/11/97.
- 1997 TV presentation (CBS Evening News) was interviewed about the effect of sexual materials over the internet upon children (8/17/97).
- 1996 Radio presentation (Family News and Focus Syndicate, Denver); was interviewed about on-line mental health services (6/21/96).
- 1995 Radio presentation (KPIX, San Francisco); was interviewed for "National Anxiety Awareness Day" (5/5/95).
- 1995 Radio presentation for *Voices in the Family* (WHYY, Philadelphia): "Professional Boundaries in Psychotherapy" (1 hour program) (4/12/95).
- 1994 Radio presentation, *The Morning Show*, (WOAI San Antonio); was interviewed on the subject of telephone therapy, as it pertained to the O.J. Simpson Homicide Investigation (5/12/94).
- 1994 TV presentation, *Sony Live* (CNN, Atlanta) invited presenter on the subject of Confidentiality and Privileged Communication between mental health providers and their clients, with particular reference to the O. J. Simpson Homicide Investigation (6/15/94).
- 1992 TV presentation, *The TODAY Show* (NBC, New York); invited presenter on the topic "Telephone Psychotherapy", KRON (6 minutes) San Francisco (12/3/92).
- 1991 Radio presentation, *The Morning Show*, (KMOX Radio, St. Louis); was interviewed on the subject of media therapy "call-in" shows and spoke with callers about the issues (9/20/91).
- 1988 TV presentation, *Health Matters*; Stanford University School of Medicine Public Education Series; (KQED, San Francisco); Invited presentation "Improving Stress Management in our Lives" (30 minute program) (1/16/88).
- 1983 TV presentation, *11:00 News* (CBS, Channel 5, Chicago) interview about ethics in psychotherapy, advertising, insurance issues, etc. (6/29 - 6/30, 1983).

#### Newspaper, magazine, and other print media

- 1967 - present Various interviews with journalists on the subjects of psychological ethics, telephone psychotherapy, multiple role-conflict of interests, stress, sex therapy, hypnosis, biofeedback, and other mental health issues: *The New York Times* (2/9/94), *The Wall Street Journal*, *The Boston Globe* (2/3/94 and 7/96), *The Los Angeles Times*, *The Toledo Blade* (3/2/93), *American Health magazine* (July 1994), *Newsweek*, *US News and World Report* (4/29/96), *The Berkeley Wellness Letter*, *Japanese Business Journal* (Fall, 1993), *USA Today* (2/25/99), *Shape*, *Marie Claire*, *Brides* (August, 1997), *American Baby*, *Mademoiselle* (2/18/99), *Time* (5/17/99), *Redbook*, etc.

**Gilbert, Margaret**

---

**From:** Gilbert, Margaret  
**Sent:** Friday, January 26, 2001 10:06 AM  
**To:** Strachan, Sharon; Boden, Janice  
**Cc:** O'Neal, Kim (ATG)  
**Subject:** RE: Laura Brown - 98100004PY

Complainant 8 - Name - Whistle... called to express concern about the length of the proceedings. I explained the amended SOC, the new response period and the current scheduling order. I assured her that if the matter does go to hearing, that Kim would be working with her to make things as comfortable as possible. She seemed satisfied. She now requests that a copy of the Amended SOC be sent to her at 8 - Name - Whistleblower Regarding Health Care Provider or Hea... and also to 7 - Mental health information, ... at the 7 - Mental health information, Adults - Information a... I will try to do this as soon as I get the file back from Janice to get at 7 - Mental h... address. Janice has had the file since 1/9 for copying for the new RBM.

~~~~~This message may be confidential. If you received it by mistake, please notify the sender and delete the message. All messages to and from the Department of Health may be disclosed to the public.~~~~~

Margaret J. Gilbert  
Staff Attorney  
Department of Health  
PO Box 47860  
Olympia, WA 98504-7860  
Phone (360) 236-4913  
FAX (360) 236-4930  
Email Margaret.Gilbert@doh.wa.gov

-----Original Message-----

**From:** Strachan, Sharon  
**Sent:** Friday, January 26, 2001 9:42 AM  
**To:** Gilbert, Margaret  
**Subject:** RE: Laura Brown - 98100004PY

Thank you!!

-----Original Message-----

**From:** Gilbert, Margaret  
**Sent:** Friday, January 26, 2001 9:41 AM  
**To:** Strachan, Sharon  
**Subject:** RE: Laura Brown - 98100004PY

Yes, I will call her. FYI, the answer is basically that the SOC was amended to include another complaint, which starts the clock over again. Hearing is now set for May 2001 and we will be trying to settle before that.

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Olympia, WA 98504-7860  
Phone (360) 236-4913  
FAX (360) 236-4930  
Email Margaret.Gilbert@doh.wa.gov

-----Original Message-----

From: Strachan, Sharon  
Sent: Friday, January 26, 2001 9:30 AM  
To: Gilbert, Margaret  
Subject: Laura Brown - 98100004PY  
Importance: High

Good morning Margaret,

I got a call this morning from an unhappy complainant, [REDACTED] stating that she is very disappointed in how long this case has taken. She would like to have answers this morning as to where we are in the process and what the expectation is for resolution. I communicated that I would need to research and have someone get back with her. Could that someone be you? Please get back with me with an update. [REDACTED] telephone number is [REDACTED]. Thanks Margaret for your immediate attention.

**Tracking:**

**Recipient**

Strachan, Sharon

Boden, Janice

O'Neal, Kim (ATG)

**Read**

Read: 1/26/2001 10:06 AM

**Gilbert, Margaret**

**From:** Gilbert, Margaret  
**Sent:** Friday, January 26, 2001 9:41 AM  
**To:** Strachan, Sharon  
**Subject:** RE: Laura Brown - 98100004PY

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FAX (360) 236-4930  
Email Margaret.Gilbert@doh.wa.gov

*returned call 1/26/01*

-----Original Message-----

**From:** Strachan, Sharon  
**Sent:** Friday, January 26, 2001 9:30 AM  
**To:** Gilbert, Margaret  
**Subject:** Laura Brown - 98100004PY  
**Importance:** High

Good morning Margaret,

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*Amended SOC to* 8 - Name - Whistleblo...

8 - Name - Whistleblower Re...

7 - Mental health information, Adults - Informati...

8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facili...

7 - Mental health information, Adults - Informatio...

# REQUEST FOR TIMELINE EXTENSION

## Instructions:

1. Please **Type** or **Print** Clearly
2. Review HTTS Manual and applicable Policies to determine the appropriate Requesting level, Approval level and time limits for your Extension Request.
3. Be sure to attach a copy of the Case Summary Report to the Request **before** forwarding for approval.
4. Ensure that there is adequate time to process your Request **prior** to timelines running out.
5. Check only one block within the appropriate Step for "Reason for Extension".
6. Use commentary from Block VI-a of this form in the "Comments" box when entering the approved Extension on HTTS.
7. Keep the original form of the approved Extension Request with the case file; send a copy of the completed approved form – with Case Summary Report – to the Operations and Support Services Office.

| I. CASE INFORMATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Health Unit/Program:<br>2/psychology                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                  | Case #:<br>99-02-0006PY                                                                                                                                                                                                                                                                                                                                                           | Docket #: (If Applicable)<br>99-12-A-1016PY                                                                                                                                                                                                                               |
| Respondent Name (Last, First, MI)<br>Brown, Laura                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Step Start Date<br>2/23/00                                                                                                                                                                                                                                                                                                                                                                       | Previous Extensions This Step<br>60 days                                                                                                                                                                                                                                                                                                                                          | No. Days Requested<br>30                                                                                                                                                                                                                                                  |
| II. REASON FOR DELAY (Check the current Step, and the reason for the Delay)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                           |
| <input type="checkbox"/> Initial Assessment<br><input type="checkbox"/> BMA - Board/Commission Member Availability<br><input type="checkbox"/> OTR - Other<br><input type="checkbox"/> KPA - Key Personnel not Available                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <input type="checkbox"/> Investigation<br><input type="checkbox"/> MAI - Multiple Agency Involvement<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> RAI - Records Availability Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> OTR - Other | <input checked="" type="checkbox"/> Case Disposition<br><input type="checkbox"/> OER - Outside Expert Review<br><input checked="" type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input checked="" type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> BMA - Board/Commission Member not Available<br><input type="checkbox"/> OTR - Other | <input type="checkbox"/> Adjudication (SOA)<br><input type="checkbox"/> DPC - Due Process Continuance<br><input type="checkbox"/> KPA - Key Personnel Availability<br><input type="checkbox"/> CCC - Conflicting Concurrent Cases<br><input type="checkbox"/> OTR - Other |
| III. JUSTIFICATION FOR EXTENSION REQUEST: (All items must be addressed)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                           |
| <p>a. What is the cause of the delay?</p> <p>The SOC (an amended SOC) went to AAG on 8/15/00. AAG has not been able to review due to AAG assignment changes and increased workload. AAG estimates 2 weeks.</p> <p>b. What is the workplan to complete this Step (include dates for deliverables)?</p> <p>Make any changes necessary, receive signed SOC, and serve documents.</p> <p>c. Other factors the Approving Authority should consider?</p> <p>There is already an SOC out so the public is on notice. Respondent has requested additional time to answer that SOC due to being out of the country. This case involves another incident of the same sort of conduct and is being included by amending the SOC. Therefore, there is no substantial additional risk to the public by reasonable delay.</p> |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                           |

ORIGINAL

|                                                                                         |                                                           |                                                             |                        |
|-----------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|------------------------|
| <b>IV. REQUESTOR AUTHENTICATION:</b>                                                    |                                                           | (Name and authorization of person requesting the extension) |                        |
| <input checked="checked" type="checkbox"/> <u>Margaret Gilbert</u><br>NAME OF REQUESTOR | <u>Staff Attorney</u><br>TITLE/DUTY POSITION OF REQUESTOR | <br>ED's Initials<br>(If Applicable)                        | <u>9/14/00</u><br>DATE |

|                                                                                                                                             |                  |
|---------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| <b>V. APPROVAL/DISAPPROVAL:</b> (Check box indicating whether or not the request is granted. If granting, indicate number of days allowed.) |                  |
| <input type="checkbox"/> Good Cause Demonstrated – Extension Granted                                                                        | No. Days Granted |
| <input type="checkbox"/> Good Cause Not Demonstrated – Extension Not Granted                                                                |                  |

|                                                                                                                                                                                                                   |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>VI. RATIONALE:</b> (Describe the basis for your decision, and means of ensuring compliance within time granted.)                                                                                               |  |
| <p><b>a. Basis for Decision:</b></p> <p style="font-size: 1.2em; font-family: cursive;">The time required by the AAG office necessitates the extension.</p>                                                       |  |
| <p><b>b. Management Oversight to be Imposed:</b> (Mandatory when extension granted)</p> <p style="font-size: 1.2em; font-family: cursive;">The Executive Director and staff attorney to monitor case progress</p> |  |

|                                                   |                                                                                      |                        |
|---------------------------------------------------|--------------------------------------------------------------------------------------|------------------------|
| <b>VII. SIGNATURE:</b>                            |                                                                                      |                        |
| <u>Sue Shablon</u><br>NAME OF APPROVING AUTHORITY | <u>Sue Shablon by<br/>Bonnie Kay Kelly, Dir.</u><br>SIGNATURE OF APPROVING AUTHORITY | <u>9/21/00</u><br>DATE |



**Gilbert, Margaret**

**From:** Joseph Barber [josephbarber@seanet.com]  
**Sent:** Thursday, August 17, 2000 6:04 PM  
**To:** Gilbert, Margaret  
**Subject:** Re: Re Brown

Thanks.

"Gilbert, Margaret" wrote:

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or att...

otherwise. ~~~~~This message may be confidential. If you received it by mistake, please notify the sender and delete the message. All messages to and from the Department of Health may be disclosed to the public. ~~~~~

Margaret Gilbert  
Staff Attorney  
Department of Health  
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Olympia, WA 98504-7869  
Phone (360) 236-4913  
FAX (360) 236-4930  
E-mail [margaret.gilbert@doh.wa.gov](mailto:margaret.gilbert@doh.wa.gov)

-----Original Message-----

**From:** Joseph Barber [<mailto:josephbarber@seanet.com>]  
**Sent:** Thursday, August 17, 2000 10:25 AM  
**To:** Gilbert, Margaret  
**Subject:** Re: Re Brown

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an...

"Gilbert, Margaret" wrote:

You don't need to do anything with the answer at this point unless you want to share your observations about it now rather than try to remember later. I

08/18/2000

BROWN, LAURA 98100004PY SEGMENT 001 PAGE 109

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinio...

Please let me know. ~~~~~This message may be confidential. If you received it by mistake, please notify the sender and delete the message. All messages to and from the Department of Health may be disclosed to the public.~~~~~

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E-mail [margaret.gilbert@doh.wa.gov](mailto:margaret.gilbert@doh.wa.gov)

-----Original Message-----

**From:** Joseph Barber [<mailto:josephbarber@seanet.com>]

**Sent:** Thursday, August 17, 2000 9:33 AM

**To:** Gilbert, Margaret; Boden, Janice

**Subject:** Re Brown

I have read Brown's Answer to the SOC. What should I do next?

--

Joseph Barber, Ph.D.  
Clinical Professor  
Department of Rehabilitation Medicine  
University of Washington School of Medicine  
Seattle, WA 98105  
Snail Mail:  
3216 NE 45th Place, Suite 103  
Seattle, WA 98105  
OFC: 206 328-2919 PVT: 206 931-6703  
FAX: 206 527-4418  
Harborview Medical Center Ofc: 206 731-3418

--  
Joseph Barber, Ph.D.

08/18/2000

BROWN, LAURA 98100004PY SEGMENT 001 PAGE 110

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**Gilbert, Margaret**

**From:** Gilbert, Margaret  
**Sent:** Thursday, August 17, 2000 9:53 AM  
**To:** 'jbarber@u.washington.edu'  
**Subject:** RE: Re Brown

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent

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08/17/2000

BROWN, LAURA 98100004PY SEGMENT 001 PAGE 112

Harborview Medical Center Ofc: 206 731-3418

Health Professions Section 2 - Legal Unit

REQUEST FOR ADMINISTRATIVE SERVICES

RECEIVED

Date: 8/11/00 Received (Admin. Stamp): AUG 11 2000

Staff Attorney: BEC WLR MFY MJC MAE

Paralegal: LLT RAM

Reviewed if necessary? Yes \_\_\_\_\_ No \_\_\_\_\_

Respondent Name: L. Brown

Case Number: 99-02-0006 PY - merge w/ other case  
under docket 99-12-A-  
1016 PY  
SOC already  
waived.

Program: PY RCM: Barber

Respondent Attorney, if known: James E Lobsenz

Action Requested: RAGS SOA/STID Agreed Order  
Amended SOC BAP NOC B/T Other \_\_\_\_\_  
#4

Was an extension requested for this case?

Yes X No \_\_\_\_\_ If so, what is the final due date? 9/20/00

If this is a RAGS request, is there an agreed order on the S:  
drive?

Yes \_\_\_\_\_ No X

Do you want a settlement conference scheduled once the  
scheduling order is issued?

Yes \_\_\_\_\_ No X Dates Available: \_\_\_\_\_

Special Instructions:

Please attach the e-mail with RAGS.

Mg

## **Gilbert, Margaret**

---

**From:** Gilbert, Margaret  
**Sent:** Friday, August 11, 2000 4:35 PM  
**To:** O'Neal, Kim (ATG)  
**Subject:** Laura Brown, PhD

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinion...

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**Gilbert, Margaret**

---

**From:** Gilbert, Margaret  
**Sent:** Friday, August 11, 2000 4:35 PM  
**To:** O'Neal, Kim (ATG)  
**Subject:** Laura Brown, PhD

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Please put these  
pages under  
legal corresp,  
when file is made  
Thuf MG



# REQUEST FOR TIMELINE EXTENSION

## Instructions:

1. Please **Type** or **Print** Clearly
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3. Be sure to attach a copy of the Case Summary Report to the Request **before** forwarding for approval.
4. Ensure that there is adequate time to process your Request **prior** to timelines running out.
5. Check only one block within the appropriate Step for "Reason for Extension".
6. Use commentary from Block VI-a of this form in the "Comments" box when entering the approved Extension on HTTS.
7. Keep the original form of the approved Extension Request with the case file; send a copy of the completed approved form – with Case Summary Report – to the Operations and Support Services Office.

|   |   |   |  |
|---|---|---|--|
| <b>I. CASE INFORMATION</b>  |   |   |  |
| Health Unit/Program:<br>Psychology  |   | Case #:<br>99-02-0006PY   | Docket #: (If Applicable)  |
| Respondent Name (Last, First, MI)<br>Brown, Laura   | Step Start Date<br>2/23/00  | Previous Extensions This Step<br>0  | No. Days Requested<br>60   |
| <b>II. REASON FOR DELAY</b> (Check the current Step, and the reason for the Delay)  |   |   |  |
| <input type="checkbox"/> <b>Initial Assessment</b><br><input type="checkbox"/> BMA - Board/Commission Member Availability<br><input type="checkbox"/> OTR - Other<br><input type="checkbox"/> KPA - Key Personnel not Available   | <input type="checkbox"/> <b>Investigation</b><br><input type="checkbox"/> MAI - Multiple Agency Involvement<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> RAI - Records Availability Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> OTR - Other | <input checked="" type="checkbox"/> <b>Case Disposition</b><br><input type="checkbox"/> OER - Outside Expert Review<br><input checked="" type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> BMA - Board/Commission Member not Available<br><input type="checkbox"/> OTR - Other | <input type="checkbox"/> <b>Adjudication (SOA)</b><br><input type="checkbox"/> DPC - Due Process Continuance<br><input type="checkbox"/> KPA - Key Personnel Availability<br><input type="checkbox"/> CCC - Conflicting Concurrent Cases<br><input type="checkbox"/> OTR - Other |
| <b>III. JUSTIFICATION FOR EXTENSION REQUEST:</b> (All items must be addressed)  |   |   |  |
| <p>a. What is the cause of the delay?</p> <p>This case was received from investigations on February 23. However, its companion case, 99-02-0005 did not arrive until March 20. The companion case had many documents relevant to both cases. Legal reviews on both were completed April 24, went through CMT, were copied by program, and were sent to the RBM on May 22. The board authorized SOC on June 16. To legal unit for drafting SOC on June 19.</p> <p>b. What is the workplan to complete this Step (include dates for deliverables)?</p> <p>Draft SOC and send RAGS by August 1. This will be amendment of a prior SOC per discussion with AAG. However, we are getting a new AAG who will require adequate time to review both the original file (3 boxes as well as the current case (1 box). Anticipate receipt by September 1 and service by September 8.</p> <p>c. Other factors the Approving Authority should consider?</p> <p>Complexity of prior case and interrelated case re another psychologist.</p> |   |   |  |

ORIGINAL

|                                      |                |   |
|--------------------------------------|----------------|---|
| <b>IV. REQUESTOR AUTHENTICATION:</b> |                | (Name and authorization of person requesting the extension) |
| Margaret Gilbert                     | Staff Attorney | 7/12/00   |

**V. APPROVAL/DISAPPROVAL:** (Check box indicating whether or not the request is granted. If granting, indicate number of days allowed.)☒ Good Cause Demonstrated – Extension Granted

No. Days Granted 60

☐ Good Cause Not Demonstrated – Extension Not Granted**VI. RATIONALE:** (Describe the basis for your decision, and means of ensuring compliance within time granted.)**a. Basis for Decision:**

This has been an extremely complicated case that involves multiple complaints against multiple respondents. It has been closely followed & analyzed by staff.

**b. Management Oversight to be Imposed:** (Mandatory when extension granted)

- ED to be notified within 2 days if the timelines in III.b. are not met.

**VII. SIGNATURE:**

L.A. Jenkins

NAME OF APPROVING AUTHORITY



SIGNATURE OF APPROVING AUTHORITY

7/13/00

DATE

## Staff Attorney Assignment Worksheet

Respondent Name: Lauren Brown

Case #(s): 99-02-0006 PY

Program: Psychology

Received through CMT on: 6-19-00

### ACTION REQUESTED:

☐ Legal Review

Due Date (14 days): \_\_\_\_\_

☐ Draft SOA/STID

Drafting:

Due Date (30 days): \_\_\_\_\_

Service:

Due Date (7 days): \_\_\_\_\_

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☐ NOC

Drafting:

Due Date (140 days): \_\_\_\_\_

☐ Below Threshold

Drafting:

Due Date (14 days): \_\_\_\_\_

☐ Other: \_\_\_\_\_

Staff Attorney assigned: ~~MG~~ MFY BEC MAE WLR

Other assigned: LLT RAM

Date assigned: 6-19-00

☒ ASI updated ☒ TIMELINES updated

**Gilbert, Margaret**

---

**From:** Joseph Barber [josephbarber@seanet.com]

**Sent:** Thursday, June 01, 2000 12:18 PM

**To:** Gilbert, Margaret

**Subject:** Re: LBrown - agreed order terms

Looks clear and complete and to the point. Thanks, Margaret.

"Gilbert, Margaret" wrote:

**-CONFIDENTIAL COMMUNICATION-**

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions...

06/05/2000

*1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressio...*

~~~~~This message may be confidential. If you received it by mistake, please notify the sender and delete the message. All messages to and from the Department of Health may be disclosed to the public.~~~~~

**Margaret Gilbert**  
**Staff Attorney**  
**Department of Health**  
**PO Box 47869**  
**Olympia, WA 98504-7869**  
**Phone (360) 236-4913**  
**FAX (360) 236-4930**  
**E-mail [margaret.gilbert@doh.wa.gov](mailto:margaret.gilbert@doh.wa.gov)**

06/05/2000

--

Joseph Barber, Ph.D.  
Department of Rehabilitation Medicine  
University of Washington School of Medicine  
Seattle, WA 98105  
Snail Mail:  
3216 NE 45th Place, Suite 103  
Seattle, WA 98105  
OFC: 206 328-2919  
FAX: 206 527-4418

Health Professions Section 2 – Legal Unit

REQUEST FOR ADMINISTRATIVE SERVICES

Date: 5/24/00 Received (Admin. Stamp): \_\_\_\_\_

Staff Attorney: BEC WLR MFY  MJG  MAE

Paralegal: LLT RAM

Reviewed if necessary? NA Yes \_\_\_\_\_ No \_\_\_\_\_

Respondent Name: L. Brown

Case Number: 98-10-0004PY

Program: PY RDM: Barber

Respondent Attorney, if known: \_\_\_\_\_

Action Requested:  RAGS  SOA/STID Agreed Order  
SOC BAP NOC B/T Other \_\_\_\_\_

Was an extension requested for this case?

Yes X No \_\_\_\_\_ If so, what is the final due date? 6/23/00

If this is a RAGS request, is there an agreed order on the S: But LAD says get it back by 6/15. See Extension.  
drive?

Yes \_\_\_\_\_ No \_\_\_\_\_

Do you want a settlement conference scheduled once the scheduling order is issued?

Yes \_\_\_\_\_ No \_\_\_\_\_ Dates Available: \_\_\_\_\_

Special Instructions:

SOC. 2 is on S drive. AO will follow  
but lets get this signed asap!

**DEPARTMENT OF HEALTH  
HEALTH PROFESSIONS QUALITY ASSURANCE DIVISION  
UNIT 2**

May 22, 2000

**TO:** Dr. Barber, Reviewing Board Member  
**CC:** Janice Boden, Program Manager  
**FROM:** Margaret Gilbert, Staff Attorney  
**Subject:** 99-02-0006PY Laura Brown, PhD

---

Here is the file and case disposition summary and recommendation in this case.

Please note this case and 99-02-0005 are related. Some of the materials are related to both cases and have been copied only once.

This case should be presented to the Board for disposition decision at the next case disposition panel. (NOTE: this will be the June board meeting!) The other Board panel members will be given a copy of the summary and recommendations at that time.

- Please let me know what your recommendation will be prior to the meeting so it can be included in the copy given the rest of the Board.
- If you cannot serve as RBM due to conflict, please notify me or Janice as soon as possible so the case can be reassigned.
- If you will not be able to present the case at the meeting or panel conference call, let me know what your recommendation is and I will present it.

Thank you.



**Gilbert, Margaret**

---

**From:** Gilbert, Margaret  
**Sent:** Friday, May 19, 2000 2:20 PM  
**To:** Anderson, Delia (ATG)  
**Subject:** Laura Brown SOC meeting

Sorry you are sick today. It was a convenient meeting window for both of us.

I need to try to reschedule asap due to timeline restrictions. The conditions of the extension I requested are that we reach agreement by 6/5.

I'm available

23rd 10-12

24th 1-2:30

25th 3-5

26th morning

Hope one of those works for you.

~~~~~This message may be confidential. If you received it by mistake, please notify the sender and delete the message. All messages to and from the Department of Health may be disclosed to the public.~~~~~

Margaret Gilbert  
Staff Attorney  
Department of Health  
PO Box 47869  
Olympia, WA 98504-7869  
Phone (360) 236-4913  
FAX (360) 236-4930  
E-mail [margaret.gilbert@doh.wa.gov](mailto:margaret.gilbert@doh.wa.gov)

## CASE DISPOSITION WORKSHEET

**Case Number:** 99070002PY

**Disposition summary**

Date prepared: April 10, 2000, updated May 17, 2000  
Prepared by: Margaret J. Gilbert, Staff Attorney

**Facts:**

This case involves care provided by Respondent to two members of a merged family. The family consists of father and mother, two adult children of the mother, and two juvenile children of the father. Therapy was provided to one of the adult daughters and to the minor son.

The son was referred by his family physician in May 1998. The boy, then 12, had a lengthy history of mental and physical problems. However presenting problems were depression and getting in trouble both at home and at school. During therapy, Respondent identified problems with bedwetting and soiling, which she determined to be related to the boy being denied bathroom access for approximately twelve hours at night. Respondent also identified other parenting issues, principally that the father was inadequately involved and the mother was too strict. Respondent discussed the problems with a peer group and decided not to report to CPS when the bathroom issue was resolved. The family quit therapy in August 1998.

Meanwhile, one of the adult daughters had been suspended from college when she failed to take medication for a bipolar condition. At stepmother's urging, the daughter saw Respondent from May through August 1998. Respondent was satisfied that the daughter understood the need to take the medication and, as requested, wrote a letter to the college urging reinstatement. Daughter returned to college and successfully completed her studies.

Then in the spring of 1999, CPS started dependency proceedings as to the son. Although the complainants (mother and treated adult daughter) believe this was a result of Respondent reporting, records show reports of abuse came from other sources and Respondent was contacted on one occasion by the CPS worker in the spring of 1999. At that time Respondent wrote a letter and provided oral information based on the brief term of treatment. Respondent's lack of contemporary information was clearly identified.

The complaints were filed in July 1999 by mother, adult daughter who was treated, and the now-ten-year-old youngest child (not the son treated). As pointed out by Respondent's attorney, all three letters contain information for which the writer had no personal knowledge. Among the additional allegations are inaccurate records (minor inaccuracies may/do exist), failure to take notes during the sessions (Respondent makes notes following the sessions and attends to the client during the session), release of information about the treated members to other family members without authorization, and substandard care.

**Analysis:**

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Risk minimal and not likely to reoccur  
 Complainant withdrew complaint  
 Care rendered was within the standard of care  
 Unique closure reason \_\_\_\_\_

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Take the following action

NOC  
 SOA & STID  
 SOC

Return to investigation for \_\_\_\_\_

CMT recommendation (date) \_\_\_\_\_.

RBM recommendation received on (date) \_\_\_\_\_ via (method) \_\_\_\_\_ by  
 (initial) \_\_\_\_\_.

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or ...

# REQUEST FOR TIMELINE EXTENSION

## Instructions:

1. Please **Type** or **Print** Clearly
2. Review HTTS Manual and applicable Policies to determine the appropriate Requesting level, Approval level and time limits for your Extension Request.
3. Be sure to attach a copy of the Case Summary Report to the Request **before** forwarding for approval.
4. Ensure that there is adequate time to process your Request **prior** to timelines running out.
5. Check only one block within the appropriate Step for "Reason for Extension".
6. Use commentary from Block VI-a of this form in the "Comments" box when entering the approved Extension on HTTS.
7. Keep the original form of the approved Extension Request with the case file; send a copy of the completed approved form – with Case Summary Report – to the Operations and Support Services Office.

|   |   |   |  |
|---|---|---|--|
| <b>I. CASE INFORMATION</b>  |   |   |  |
| Health Unit/Program:<br>2/psychology  |   | Case #:<br>98100004PY   | Docket #: (If Applicable)<br>99-12-A-1016PY  |
| Respondent Name (Last, First, MI)<br>Brown, Laura S.  | Step Start Date<br>06/07/00   | Previous Extensions This Step<br>2 (grandfather +ED)  | No. Days Requested<br>30   |
| <b>II. REASON FOR DELAY</b> (Check the current Step, and the reason for the Delay)  |   |   |  |
| <input type="checkbox"/> <b>Initial Assessment</b><br><input type="checkbox"/> BMA - Board/Commission Member Availability<br><input type="checkbox"/> OTR - Other<br><input type="checkbox"/> KPA - Key Personnel not Available   | <input type="checkbox"/> <b>Investigation</b><br><input type="checkbox"/> MAI - Multiple Agency Involvement<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> RAI - Records Availability Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> OTR - Other | <input checked="" type="checkbox"/> <b>Case Disposition</b><br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> BMA - Board/Commission Member not Available<br><input checked="" type="checkbox"/> OTR - Other | <input type="checkbox"/> <b>Adjudication (SOA)</b><br><input type="checkbox"/> DPC - Due Process Continuance<br><input type="checkbox"/> KPA - Key Personnel Availability<br><input type="checkbox"/> CCC - Conflicting Concurrent Cases<br><input type="checkbox"/> OTR - Other |
| <b>III. JUSTIFICATION FOR EXTENSION REQUEST:</b> (All items must be addressed)  |   |   |  |
| <p>a. What is the cause of the delay?</p> <p>RAGs went to AAG on 12/8/99 with approximately 40 days left in step. AAG returned it to investigations. Additional information provided to AAG on 3/13/00 with 60 days (grandfather extension had been added) available. Proposed changes received from AAG on 5/12/00 with 12 days left. Meeting scheduled between SA and AAG to discuss differences on 5/19 as AAG not available earlier.</p> <p>b. What is the workplan to complete this Step (include dates for deliverables)?</p> <p>Legal admin will need to add and format agreed upon changes. Once signed SOC is received, legal admin will serve within 7 days.</p> <p>c. Other factors the Approving Authority should consider?</p> <p>This is a complex case involving a prominent psychologist.</p> |   |   |  |

ORIGINAL

|                                      |   |
|--------------------------------------|---|
| <b>IV. REQUESTOR AUTHENTICATION:</b> | (Name and authorization of person requesting the extension) |
| Margaret Gilbert                     | Staff attorney  |
|                                      | 5/16/00   |

**V. APPROVAL/DISAPPROVAL:** (Check box indicating whether or not the request is granted. If granting, indicate number of days allowed.)☒ Good Cause Demonstrated – Extension Granted

No. Days Granted

30

☐ Good Cause Not Demonstrated – Extension Not Granted**VI. RATIONALE:** (Describe the basis for your decision, and means of ensuring compliance within time granted.)**a. Basis for Decision:**

Complex case that has been being moved as quickly as possible

**b. Management Oversight to be Imposed:** (Mandatory when extension granted)

- 1) AG's office to make decision to transmit case back to legal unit no later than 6/5/00.
- 2) If SA & AAG are unable to agree on changes in 5/19 mtg, set up joint meeting with EB immediately

**VII. SIGNATURE:**

L.A. Jenkins

NAME OF APPROVING AUTHORITY

JLM

SIGNATURE OF APPROVING AUTHORITY

5/18/00

DATE

## **Gilbert, Margaret**

---

**From:** Gilbert, Margaret  
**Sent:** Monday, May 15, 2000 11:43 AM  
**To:** Anderson, Delia (ATG)  
**Subject:** RE: Laura Brown, PhD - changes to SOC

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent

Thanks.

^^^^^^^This message may be confidential. If you received it by mistake, please notify the sender and delete the message. All messages to and from the Department of Health may be disclosed to the public. ^^^^^^^

Margaret Gilbert  
Staff Attorney  
Department of Health  
PO Box 47869  
Olympia, WA 98504-7869  
Phone (360) 236-4913  
FAX (360) 236-4930  
E-mail [margaret.gilbert@doh.wa.gov](mailto:margaret.gilbert@doh.wa.gov)

-----Original Message-----

**From:** Anderson, Delia (ATG)  
**Sent:** Friday, May 12, 2000 5:41 PM  
**To:** Gilbert, Margaret  
**Subject:** Laura Brown, PhD - changes to SOC

**CONFIDENTIAL**  
**Attorney-Client Privilege**

<< File: Changes to SOC.doc >>

Hi Margaret - here are my changes to the SOC - I've skimmed the new documents, and I spent an hour and a half talking to 7 - Mental health information, ... yesterday. Let me know what you think. This is a complicated case.

I'll be out on Monday.

**Gilbert, Margaret**

---

**From:** Anderson, Delia (ATG)  
**Sent:** Friday, May 12, 2000 5:41 PM  
**To:** Gilbert, Margaret  
**Subject:** Laura Brown, PhD - changes to SOC

**CONFIDENTIAL**  
**Attorney-Client Privilege**



Changes to SOC.doc

Hi Margaret - here are my changes to the SOC - I've skimmed the new documents, and I spent an hour and a half talking to 7 - Mental health information, ... yesterday. Let me know what you think. This is a complicated case.

I'll be out on Monday.

## **Facts**

1.1 Laura S. Brown, Ph.D., Respondent, was issued a license to practice as a psychologist in the state of Washington in January 1979.

1.2 In approximately February 1995, Respondent entered into a consulting relationship with Client B. Client B is also a psychologist. Client B hired Respondent because of her reputed expertise in professional boundaries. She retained Respondent as a forensic consultant to help her determine whether her prior therapist had violated professional boundaries with her, whether she should file a complaint with that therapist's licensing board and/or a civil lawsuit against the therapist for damages, and to assist her with any litigation that might ensue.

1.3 Until approximately July 1997, Client B lived in the state of Georgia. Respondent and Client B engaged in telephone "consultations" on a weekly or frequent basis.

1.4 Although Client B did not retain Respondent as a therapist, the relationship quickly developed aspects of informal therapy. During the telephone "consultations," Respondent encouraged Client B to work through the post-traumatic stress caused by the prior therapist and to discuss other problems in her life, and assisted Client B with those problems.

1.5 In June 1996, Respondent abruptly terminated her relationship with Client B. She refused to communicate with Client B throughout the summer of 1996, and did not help Client B find a substitute consulting expert. This was a critical time in the consulting relationship, because the statute of limitations was about to run on Client B's civil claim against the prior therapist. Client B was relying on Respondent to help her find an appropriate attorney and to inform that attorney about the forensic issues in the case. Respondent did not return Client B's calls until approximately three days before the statute of limitations deadline, by which time it was too late to prepare a complaint. Client B lost her ability to pursue a civil claim against her therapist at least in part because of Respondent's abandonment.



1.6 Respondent and Client B reconciled during the fall of 1996. Respondent continued to act as Client B's forensic consultant with respect to the complaint that Client B had filed with the prior therapist's licensing board.

1.7 In the fall of 1996, Respondent began sharing her personal stresses and problems with Client B, asking her for advice, and using her for her own therapeutic needs.

1.8 At the same time, Respondent and Client B developed a close personal friendship.

1.9 In approximately November 1996, Respondent entered into a research relationship with Client B. Client B had been working on a research project regarding non-sexual harm in psychotherapy. Respondent offered to assist her with the project, and Client B accepted her offer.

1.10 Respondent subsequently urged Client B to relocate from Georgia to Port Townsend, Washington. She offered to put her in touch with one of her clients who lived in Port Townsend: Client A. Respondent had been providing therapy to Client A since approximately 1989. Respondent obtained the consent of both Client A and Client B before putting them in touch with each other.

1.11 During the spring of 1997, Client A and Client B corresponded with each other by e-mail. Client B moved to Port Townsend in approximately July 1997. Client A and Client B soon became close friends.

1.12 A triangular relationship subsequently developed between Respondent, Client A, and Client B.

1.13 In approximately January 1998, Client A had a falling out with Client B. Client A began using her therapy sessions to address the problems she was having with Client B. Respondent placed herself in the middle of this relationship, and encouraged Client A to break off her friendship with Client B.

1.14 Client A and Client B resumed their friendship in approximately February 1998.

1.15 Respondent alternated between being friendly and hostile towards Client B. Client A became distressed during the times that Respondent was hostile towards Client B. Her therapy sessions often focused on Respondent's relationship with Client B.

1.16 In approximately 1998, Respondent began to use Client A for her own emotional support. Respondent discussed the problems she was having in her personal life and, in particular, her tumultuous relationship with Client B.

1.17 Respondent divulged confidential information about Client A to Client B and to Client's A's partner without Client A's consent.

1.18 Respondent divulged confidential information about Client B to Client A without Client B's consent.

1.19 In June 1998, Respondent abruptly terminated all contact with Client A. She abandoned Client A without referring Client A to another therapist.

1.20 In June 1998, Respondent abruptly terminated all contact with Client B. She abandoned the consulting and research relationships without helping Client B find a substitute psychologist for those roles. Respondent and Client B had been scheduled to present their research at a professional conference on boundary violations in October 1998. Respondent failed to assist Client B in preparing for that conference, ignored Client B's requests that she return Client B's research materials to her, and withdrew their presentation from the conference without Client B's consent or knowledge.

1.21 Respondent failed to maintain adequate records of the professional services that she provided to Client A.

1.22 Respondent failed to maintain adequate records of the professional services that she provided to Client B.

### **Violations**

2.1 The violations alleged in paragraphs 1.2 through 1.4, and 1.6 through 1.16 constitute unprofessional conduct in violation of RCW 18.130.180(4), (7); WAC 246-924-356; and WAC 246-924-357.

2.2 The violations alleged in paragraphs 1.5, 1.19, and 1.20 constitute unprofessional conduct in violation of RCW 18.130.180(4), (7); and WAC 246-924-359(2).

2.3 The violations alleged in paragraphs 1.17 and 1.18 constitute unprofessional conduct in violation of RCW 18.130.180(7); and WAC 246-924-363(1).

2.4 The violations alleged in paragraphs 1.21 and 1.22 constitute unprofessional conduct in violation of RCW 18.130.180(4), (7); and WAC 246-924-354.

The texts of the alleged violations is as follows:



1.1 Laura S. Brown, Ph.D., Respondent, was issued a license to practice as a psychologist in the State of Washington in January, 1979.

1.2 Between approximately 1989 and 1998, Respondent treated Client A for issues related to chronic illness, loss of professional license and depression. Client A resided in Washington.

1.3 In 1995, Respondent accepted Client B as a "consultation client". Client B was a resident of Georgia and is a psychologist. Initial issues were prior therapist abuse and legal proceedings resulting from that abuse. Respondent provided a disclosure form and billed for the sessions, which were conducted by telephone and by e-mail. There was no identified conclusion to the therapy or termination.

1.4 Respondent also began a collegial relationship with Client B, serving as a peer consultant and collaborating on professional research. This relationship was never concluded or terminated.

1.5 In approximately 1997, Client B became interested in moving to Washington. With the consent of both clients, Respondent introduced Client A and Client B to each other. Client B did move to Washington and became friends with Client A.

1.6 A triangle of relationships resulted. The triangle became the focus of Respondent's therapy with Client A. Respondent believed Client B was abusing both Client A and Respondent herself. All three (3) attempted to achieve understanding and reconciliation but were not successful. Client A became depressed and had to resume taking medication.



1.7 In mid-1998 Respondent offered three (3) alternatives to Client A: termination and referral, continued limited therapy, and time out. Client A did not receive the offer. There was no resolution to the situation. After May 1998, Respondent ceased contact with Client A.

1.8 After May 1998, Respondent refused further contact with Client B. The relationship was not terminated and Client B was offered no alternative resources.

## **Section 2: ALLEGED VIOLATIONS**

2.1 The violations alleged in this section constitute grounds for disciplinary action pursuant to RCW 18.130.180 and the imposition of sanctions under RCW 18.130.160.

2.2 The facts alleged in paragraphs 1.2 through 1.8 constitute unprofessional conduct in violation of RCW 18.130.180(4) and (13) which provide that unprofessional conduct by a license holder includes:

(4) Incompetence, negligence, or malpractice which results in injury to a patient or which creates an unreasonable risk that a patient may be harmed. . .

. . .

(7) Violation of any state or federal statute or administrative rule regulating the profession in question, including any statute or rule defining or establishing standards of patient care or professional conduct or practice.

Respondent has violated WAC 246-924-356, -357, and -359 which provide:

WAC 246-924-356 Impaired objectivity.





The psychologist shall not undertake or continue a professional relationship with a client when the competency of the psychologist is impaired due to mental, emotional, physical, pharmacological, or substance abuse conditions. If such a condition develops after a professional relationship has been initiated, the psychologist shall terminate the relationship in an appropriate manner, and shall assist the client in obtaining services from another professional.

**WAC 246-924-357 Multiple relationships.**

The psychologist shall not undertake or continue a professional relationship with a client when the objectivity or competency of the psychologist is impaired because of the psychologist's present or previous familial, social, sexual, emotional, financial, supervisory, political, administrative, or legal relationship with the client or a person associated with or related to the client. When such relationship impairs objectivity, the psychologist shall terminate the professional relationship with adequate notice and in an appropriate manner; and shall assist the client in obtaining services from another professional.

**WAC 246-924-359 Client welfare.**

...

(2) Termination of services. Whenever professional services are terminated, the psychologist shall offer to help locate alternative sources of professional services or assistance if necessary. Psychologists shall terminate a professional relationship when it would become clear to a reasonable, prudent psychologist that the client no longer needs the service, is not benefitting, or is being harmed by continued service.



**Gilbert, Margaret**

---

**From:** Anderson, Delia (ATG)  
**Sent:** Sunday, April 30, 2000 5:33 PM  
**To:** Reed, Gary  
**Cc:** Gilbert, Margaret; Boden, Janice  
**Subject:** Laura Brown, PhD - source(s) of the 6 binders of supplemental documents

**CONFIDENTIAL**  
**Attorney-Client Privilege**

2 - Attorney-Client Privileged - RCW 5.60.060(2)(a), RCW 42.56.070(1) - Communications between attorney and client or between clients for the purpose of gathering informati

**Delia Anderson**  
Attorney General's Office  
Licensing & Employment Security Division  
[deliaa@atg.wa.gov](mailto:deliaa@atg.wa.gov)  
☎ (360) 753-2711  
☎ FAX: (360) 664-0174  
☎ MS: 40110

## **CASE DISPOSITION WORKSHEET**

**Case Number:**        **99020006PY**

**Disposition summary**

    Date prepared:        **April 24, 2000**

    Prepared by:         **Margaret J. Gilbert, Staff Attorney**

**Facts:**

There are two related cases here. 99020005 and 99020006.

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent





*1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's ag*

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Risk minimal and not likely to reoccur  
 Complainant withdrew complaint  
 Care rendered was within the standard of care  
 Unique closure reason \_\_\_\_\_

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Take the following action

NOC  
 SOA & STID  
 SOC

Return to investigation for \_\_\_\_\_

CMT recommendation (date) \_\_\_\_\_.

RBM recommendation received on (date) \_\_\_\_\_ via (method) \_\_\_\_\_ by  
 (initial) \_\_\_\_\_.

**Case Disposition panel and staff:**

Reviewing member:

Panel members:

Board mtg

Margaret Gilbert, Staff Attorney

Panel meeting date:

6/16/08

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent

☐

Return to investigate these issues:

## Staff Attorney Assignment Worksheet

Respondent Name: Laura Brown

Case #(s): 99-02-0006PY

Program: Psychology

Received through CMT on: 3-20-00

### ACTION REQUESTED:

☒ Legal Review

Due Date (14 days): 4-3-00

☐ Draft SOA/STID

Drafting:

Due Date (30 days): \_\_\_\_\_

Service:

Due Date (7 days): \_\_\_\_\_

☐ Draft SOC

Drafting:

Due Date (30 days): \_\_\_\_\_

Send RAGS to AAG:

Due Date (7 days): \_\_\_\_\_

Due back from AAG:

Due Date (30 days): \_\_\_\_\_

Service to respondent:

Due Date (7 days): \_\_\_\_\_

☐ NOC

Drafting:

Due Date (140 days): \_\_\_\_\_

☐ Below Threshold

Drafting:

Due Date (14 days): \_\_\_\_\_

☐ Other: \_\_\_\_\_

Staff Attorney assigned: ~~MG~~ MFY BEC MAE WLR

Other assigned: LLT RAM

Date assigned: 3/21-00

☒ ASI updated ☒ TIMELINES updated

## REQUEST FOR TIMELINE EXTENSION

Please Type or Print Clearly

### I. CASE INFORMATION (Attach copy of Case Summary Report)

| RESPONDENT NAME (Last, First, MI) | CASE START DATE | TOTAL NO. EXTENSIONS TO DATE | NO. DAYS REQUESTED |
|-----------------------------------|-----------------|------------------------------|--------------------|
| Brown, Laura                      | 3-08-99         | 4                            | 1                  |

### II. REASON FOR EXTENSION (Please check the current Step, and the reason for the Extension Request)

|  |   |  |  |
|--|---|--|--|
| <input type="checkbox"/> <b>Initial Assessment</b><br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> BMA - Board/Commission Member Availability<br><input type="checkbox"/> OTR - Other | <input checked="" type="checkbox"/> <b>Investigation</b><br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> MAI - Multiple Agency Involvement<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> RAI - Records Availability Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input checked="" type="checkbox"/> OTR - Other: | <input type="checkbox"/> <b>Case Disposition</b><br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> BMA - Board/Commission Member not Available<br><input type="checkbox"/> OTR - Other | <input type="checkbox"/> <b>Adjudication (SOA)</b><br><input type="checkbox"/> DPC - Due Process Continuance<br><input type="checkbox"/> KPA - Key Personnel Availability<br><input type="checkbox"/> CCC - Conflicting Concurrent Cases<br><input type="checkbox"/> OTR - Other |
|--|---|--|--|

### III. JUSTIFICATION FOR EXTENSION REQUEST: (All items must be addressed)

- a. What has been done in this Step? The investigation has been completed as of 02-22-2000, but Timelines is reflecting a negative number and continues to show a negative number everyday.
- b. What remains to be done within this Step, and why is it needed? The investigation is closed. We need to file for an extension so Timelines will reflect a current status and then in turn program can continue their processing in Timelines
- c. What is the workplan to complete this Step? Request an approval, get the approval, and update Timelines.
- d. Risk from delay of case? None, case/investigation has been completed.
- e. Risk from moving case to next Step without extension of the current Step? No Risk.
- f. Other factors the Approving Authority should consider? Cannot update Timeline Tracking System.  
*CASE would have been completed on time except for State Holiday on 2/22/00.*

### IV. SIGNATURE : (Signature of individual requesting the extension)

*DAVID MAGBY*  
H:\ISU\Timeline Ext.doc / 02/22/00

*David Magby*

2/22/00  
Page 1

**V. APPROVAL/DISAPPROVAL:** (Check box indicating whether or not the request is granted. If granting, indicate number of days allowed and the appropriate reason.)☒ **Good Cause Demonstrated – Extension Granted**☐ **Initial Assessment**

No Days: \_\_\_\_\_

☐ ESI - Emergency Staffing Issue☐ BMA - Board/Commission Member Availability☐ OTR - Other☒ **Investigation**

No Days: \_\_\_\_\_

☐ ESI - Emergency Staffing Issue☐ MAI - Multiple Agency Involvement☐ ICC - Inter-related Concurrent Cases☐ KPA - Key Personnel not Available☐ RAI - Records Availability Issue☐ OER - Outside Expert Review☐ OTR - Other☐ **Case Disposition**

No Days: \_\_\_\_\_

☐ ESI - Emergency Staffing Issue☐ OER - Outside Expert Review☐ ICC - Inter-related Concurrent Cases☐ KPA - Key Personnel not Available☐ BMA - Board/Commission Member not Available☐ OTR - Other☐ **Adjudication (SOA)**

No Days: \_\_\_\_\_

☐ DPC - Due Process Continuance☐ KPA - Key Personnel Availability☐ CCC - Conflicting Concurrent Cases☐ OTR - Other☐ **Good Cause Not Demonstrated – Extension Not Granted****VI. RATIONALE:** (Describe the basis for your decision, and means of ensuring compliance within time granted.)**Basis for Decision:**

Status of Invest.

**Management Oversight to be Imposed:** (Mandatory when extension granted)

None

**VII. SIGNATURE:** OIC Per LAS 2/23/00 phc

PE Drutman

3/3/07

NAME OF APPROVING AUTHORITY

SIGNATURE OF APPROVING AUTHORITY

DATE



Health Unit/Prog  
Health Unit 2/Psychology  
Program # / Docket #:  
98-10-0004PY

## REQUEST FOR TIMELINE EXTENSION

Please Type or Print Clearly

| I. CASE INFORMATION               |                 | (Attach copy of Case Summary Report) |                    |
|-----------------------------------|-----------------|--------------------------------------|--------------------|
| RESPONDENT NAME (Last, First, MI) | CASE START DATE | TOTAL NO. EXTENSIONS TO DATE         | NO. DAYS REQUESTED |
| Brown, Laura S.                   | 11-02-98        | 1                                    | 90                 |

### II. REASON FOR EXTENSION (Please check the current Step, and the reason for the Extension Request)

|   |  |   |   |
|---|--|---|---|
| <input type="checkbox"/> Initial Assessment<br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> BMA - Board/Commission Member Availability<br><input type="checkbox"/> OTR - Other | <input checked="" type="checkbox"/> Investigation<br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> MAI - Multiple Agency Involvement<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input checked="" type="checkbox"/> RAI - Records Availability Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input checked="" type="checkbox"/> OTR - Other | <input type="checkbox"/> Case Disposition<br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> BMA - Board/Commission Member not Available<br><input type="checkbox"/> OTR - Other | <input type="checkbox"/> Adjudication (SOA)<br><input type="checkbox"/> DPC - Due Process Continuance<br><input type="checkbox"/> KPA - Key Personnel Availability<br><input type="checkbox"/> CCC - Conflicting Concurrent Cases<br><input type="checkbox"/> OTR - Other |
|---|--|---|---|

### III. JUSTIFICATION FOR EXTENSION REQUEST: (All items must be addressed)

a. What has been done in this Step?

The investigation was completed (before institution of timelines) and this case has been in Case Disposition. One extension was requested in case disposition. The Staff Attorney has drafted a Statement of Charges (draft) and the investigation file was reviewed by the AAG. The AAG has requested additional investigation.

b. What remains to be done within this Step, and why is it needed?

A Letter of Cooperation was sent to the respondent and her attorney for the requested additional information by the AAG. A letter was received from the respondent's attorney stating his client probably has additional records, but will not be able to look for the additional records until the latter half of February 2000, and they will make every effort to get the records sought, which are in existence, by March 1, 2000. A copy of the attorney's letter has been forwarded to the AAG. Also, the AAG has requested that the complainant submit copies of her entire body of e-mails with the respondent to us since 1997. I received an e-mail from the complainant stating she has now printed off copies of all the e-mails (4 1/4 inches tall) and she is busy going through each page and marking who said what, per the AAG's request. I forwarded a copy of the e-mail I received from the complainant to the AAG as well.

c. What is the workplan to complete this Step?

Wait and see if I receive this information by 03-01-2000. If not, I can send a final demand letter requesting the information to the respondent and her attorney, and if it is not received the AAG can determine what she wishes to do about that.

d. Risk from delay of case?

This is a serious case and should not be closed without action.



e. Risk from moving case to next step without extension of the current Step?

Same.

f. Other factors the Approving Authority should consider?

The respondent in this case is a department expert, highly known within her profession.

**IV. SIGNATURE :** (Signature of individual requesting the extension)

*per*  
*OK LAJ 2/18/00*  
GARY E. REED Gary E. Reed 02-16-2000  
NAME OF REQUESTOR SIGNATURE OF REQUESTOR DATE

**V. APPROVAL/DISAPPROVAL:** (Check box indicating whether or not the request is granted. If granting, indicate number of days allowed and the appropriate reason.)

☒ Good Cause Demonstrated – Extension Granted

☐ Initial Assessment

No Days: \_\_\_\_\_  
☐ ESI - Emergency Staffing Issue  
☐ BMA - Board/Commission Member Availability  
☐ OTR - Other

☒ Investigation

No Days: 90  
☐ ESI - Emergency Staffing Issue  
☐ MAI - Multiple Agency Involvement  
☐ ICC - Inter-related Concurrent Cases  
☐ KPA - Key Personnel not Available  
☐ RAI - Records Availability Issue  
☐ OER - Outside Expert Review  
☐ OTR - Other

☐ Case Disposition

No Days: \_\_\_\_\_  
☐ ESI - Emergency Staffing Issue  
☐ OER - Outside Expert Review  
☐ ICC - Inter-related Concurrent Cases  
☐ KPA - Key Personnel not Available  
☐ BMA - Board/Commission Member not Available  
☐ OTR - Other

☐ Adjudication (SOA)

No Days: \_\_\_\_\_  
☐ DPC - Due Process Continuance  
☐ KPA - Key Personnel Availability  
☐ CCC - Conflicting Concurrent Cases  
☐ OTR - Other

☐ Good Cause Not Demonstrated – Extension Not Granted

**VI. RATIONALE:** (Describe the basis for your decision, and means of ensuring compliance within time granted.)

**Basis for Decision:**

*Progress to date on this case + serious nature of complaint*

**Management Oversight to be Imposed:** (Mandatory when extension granted)

*Ch. Invest. review after 45 days to ensure progress according to stated plan*

**VII. SIGNATURE :**

  
NAME OF APPROVING AUTHORITY

SIGNATURE OF APPROVING AUTHORITY

2-23-00  
DATE



Health Unit/Program  
Health Unit 2/Psychology  
Program # / Docket #:  
98-10-0004PY

## REQUEST FOR TIMELINE EXTENSION

Please Type or Print Clearly

### I. CASE INFORMATION

(Attach copy of Case Summary Report)

RESPONDENT NAME (Last, First, MI)

Brown, Laura S.

CASE START DATE

11-02-98

TOTAL NO. EXTENSIONS TO DATE

0

NO. DAYS REQUESTED

~~30~~ 90?

### II. REASON FOR EXTENSION

(Please check the current Step, and the reason for the Extension Request)

☐ Initial Assessment

- ☐ ESI - Emergency Staffing Issue  
☐ BMA - Board/Commission Member Availability  
☐ OTR - Other

☒ Investigation

- ☐ ESI - Emergency Staffing Issue  
☐ MAI - Multiple Agency Involvement  
☐ ICC - Inter-related Concurrent Cases  
☐ KPA - Key Personnel not Available  
☒ RAI - Records Availability Issue  
☐ OER - Outside Expert Review  
☒ OTR - Other

☐ Case Disposition

- ☐ ESI - Emergency Staffing Issue  
☐ OER - Outside Expert Review  
☐ ICC - Inter-related Concurrent Cases  
☐ KPA - Key Personnel not Available  
☐ BMA - Board/Commission Member not Available  
☐ OTR - Other

☐ Adjudication (SOA)

- ☐ DPC - Due Process Continuance  
☐ KPA - Key Personnel Availability  
☐ CCC - Conflicting Concurrent Cases  
☐ OTR - Other

### III. JUSTIFICATION FOR EXTENSION REQUEST:

(All items must be addressed)

a. What has been done in this Step?

The investigation was completed (before institution of timelines) and this case has been in Case Disposition. It appears 1 extension was requested in Case Disposition. The Staff Attorney has drafted a Statement of Charges and the investigative file was reviewed by the AAG. The AAG has requested some additional investigation.

b. What remains to be done within this Step, and why is it needed?

I have drafted a Letter of Cooperation to the respondent and her attorney for the requested additional information requested by the AAG. I will call the complainant and request the additional information the AAG wants for her as well. This will be done as soon as this extension is approved.

c. What is the workplan to complete this Step?

Same as above.

d. Risk from delay of case?

This is a serious case and should not be closed without action.

e. Risk from moving case to next Step without extension of the current Step?

This is a serious case and should not be closed without action.

f. Other factors the Approving Authority should consider?

The respondent in this case is a department expert.

**IV. SIGNATURE :** (Signature of individual requesting the extension)

GARY E. REED  
NAME OF REQUESTOR

Gary E. Reed  
SIGNATURE OF REQUESTOR

01-05-99  
DATE

**V. APPROVAL/DISAPPROVAL:** (Check box indicating whether or not the request is granted. If granting, indicate number of days allowed and the appropriate reason.)



Good Cause Demonstrated – Extension Granted

☐ Initial Assessment

No Days: \_\_\_\_\_

- ☐ ESI - Emergency Staffing Issue  
☐ BMA - Board/Commission Member Availability  
☐ OTR - Other

☒ Investigation

No Days: 30 90

- ☐ ESI - Emergency Staffing Issue  
☐ MAI - Multiple Agency Involvement  
☐ ICC - Inter-related Concurrent Cases  
☐ KPA - Key Personnel not Available  
☐ RAI - Records Availability Issue  
☐ OER - Outside Expert Review  
☒ OTR - Other

☐ Case Disposition

No Days: \_\_\_\_\_

- ☐ ESI - Emergency Staffing Issue  
☐ OER - Outside Expert Review  
☐ ICC - Inter-related Concurrent Cases  
☐ KPA - Key Personnel not Available  
☐ BMA - Board/Commission Member not Available  
☐ OTR - Other

☐ Adjudication (SOA)

No Days: \_\_\_\_\_

- ☐ DPC - Due Process Continuance  
☐ KPA - Key Personnel Availability  
☐ CCC - Conflicting Concurrent Cases  
☐ OTR - Other

☐ Good Cause Not Demonstrated – Extension Not Granted

**VI. RATIONALE:** (Describe the basis for your decision, and means of ensuring compliance within time granted.)

**Basis for Decision:**

Original investigation was completed within timelines, this is just additional information needed to complete case in order to make charging decision.

**Management Oversight to be Imposed:** (Mandatory when extension granted)

Case to be completed w/in 30 days. Program to be notified of any delays in case planning.

**VII. SIGNATURE :**

L. A. Jenkins

NAME OF APPROVING AUTHORITY



SIGNATURE OF APPROVING AUTHORITY

1/5/00

DATE

**Myers, Susan**

---

**From:** McClintock, Sandi  
**Sent:** Wednesday, December 08, 1999 9:23 AM  
**To:** Myers, Susan  
**Subject:** RE: Laura Brown, #98-10-0004PY

**Docket No 99-12-A-1016PY issued 12/8/99**

Sandi McClintock  
Hearings Scheduler  
Adjudicative Clerk Office  
PO Box 47879  
Olympia, WA 98504-7879  
(360)236-4670

-----Original Message-----

**From:** Myers, Susan  
**Sent:** Wednesday, December 08, 1999 9:18 AM  
**To:** McClintock, Sandi  
**Subject:** Laura Brown, #98-10-0004PY

Attached is the docket request for Laura Brown, #98-10-0004PY. Thank you.

Susan Myers  
1300 SE Quince Street  
PO Box 7869  
Olympia, WA 98504-7869  
Phone: (360) 236-4903  
Fax: (360) 236-4930

12/08/1999

BROWN, LAURA 98100004PY SEGMENT 001 PAGE 154

**Myers, Susan**

---

**From:** Myers, Susan  
**Sent:** Wednesday, December 08, 1999 9:18 AM  
**To:** McClintock, Sandi  
**Subject:** Laura Brown, #98-10-0004PY

Attached is the docket request for Laura Brown, #98-10-0004PY. Thank you.

Susan Myers  
1300 SE Quince Street  
PO Box 7869  
Olympia, WA 98504-7869  
Phone: (360) 236-4903  
Fax: (360) 236-4930

RECEIVED  
DEC 06 1999

REQUEST FOR ADMINISTRATIVE SERVICES

Date: 12/6

Staff Attorney: BEC JFK MFY  MJG  MWP LLT

Respondent Name: Brown

Case Number: 98-10-0004PY

Program: PY RBM: Barber

Respondent Attorney, if known: \_\_\_\_\_

Action Requested:  RAGS  SOA/STID Agreed Order

BAP Other: \_\_\_\_\_

If this is a RAGS request, is there an agreed order on the S: drive?

Yes \_\_\_\_\_ No X will be done later

If no, do you want a settlement conference scheduled once the scheduling order is issued?

Yes \_\_\_\_\_ No X

Special Instructions: \_\_\_\_\_

This case is on extension. Please expedite.  
Send draft to RBM for review too.  
Thx





Health Unit/Prog

Health Unit 2/Psychology

Program # / Docket #:

98-10-0004

## REQUEST FOR TIMELINE EXTENSION

Please Type or Print Clearly

### I. CASE INFORMATION (Attach copy of Case Summary Report)

| RESPONDENT NAME (Last, First, MI) | CASE START DATE | TOTAL NO. EXTENSIONS TO DATE | NO. DAYS REQUESTED |
|-----------------------------------|-----------------|------------------------------|--------------------|
| Brown, Laura                      | 10-20-98        | 0                            | 90                 |

### II. REASON FOR EXTENSION (Please check the current Step, and the reason for the Extension Request)

|   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> Initial Assessment<br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> BMA - Board/Commission Member Availability<br><input type="checkbox"/> OTR - Other | <input type="checkbox"/> Investigation<br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> MAI - Multiple Agency Involvement<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> RAI - Records Availability Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> OTR - Other | <input checked="" type="checkbox"/> Case Disposition<br><input type="checkbox"/> ESI - Emergency Staffing Issue<br><input type="checkbox"/> OER - Outside Expert Review<br><input type="checkbox"/> ICC - Inter-related Concurrent Cases<br><input type="checkbox"/> KPA - Key Personnel not Available<br><input type="checkbox"/> BMA - Board/Commission Member not Available<br><input type="checkbox"/> OTR - Other | <input type="checkbox"/> Adjudication (SOA)<br><input type="checkbox"/> DPC - Due Process Continuance<br><input type="checkbox"/> KPA - Key Personnel Availability<br><input type="checkbox"/> CCC - Conflicting Concurrent Cases<br><input type="checkbox"/> OTR - Other |
|---|---|--|---|

### III. JUSTIFICATION FOR EXTENSION REQUEST: (All items must be addressed)

a. What has been done in this Step?

Case transferred to staff attorney for drafting of Statement of Charges.

b. What remains to be done within this Step, and why is it needed?

Legal review for determining decision to charge.

c. What is the workplan to complete this Step?

Draft Statement of Charges and serve.

d. Risk from delay of case?

None.

e. Risk from moving case to next Step without extension of the current Step?

This is a serious case and should not be closed without action taken.

f. Other factors the Approving Authority should consider?

The respondent in this case is a department expert.

ORIGINAL

### IV. SIGNATURE : (Signature of individual requesting the extension)

Traci Troutman

NAME OF REQUESTOR

SIGNATURE OF REQUESTOR

10-18-99

DATE

# V. APPROVAL/DISAPPROVAL

(Check box indicating whether or not the request is granted. If granting, indicate number of days allowed and the appropriate reason.)

## ☐ Good Cause Demonstrated – Extension Granted

### ☐ Initial Assessment

No Days: \_\_\_\_\_

- ☐ ESI - Emergency Staffing Issue
- ☐ BMA - Board/Commission Member Availability
- ☐ OTR - Other

### ☐ Investigation

No Days: \_\_\_\_\_

- ☐ ESI - Emergency Staffing Issue
- ☐ MAI - Multiple Agency Involvement
- ☐ ICC - Inter-related Concurrent Cases
- ☐ KPA - Key Personnel not Available
- ☐ RAI - Records Availability Issue
- ☐ OER - Outside Expert Review
- ☐ OTR - Other

### ☒ Case Disposition

No Days: 90

- ☒ ESI - Emergency Staffing Issue
- ☐ OER - Outside Expert Review
- ☐ ICC - Inter-related Concurrent Cases
- ☐ KPA - Key Personnel not Available
- ☐ BMA - Board/Commission Member not Available
- ☒ OTR - Other Complex Case

### ☐ Adjudication (SOA)

No Days: \_\_\_\_\_

- ☐ DPC - Due Process Continuance
- ☐ KPA - Key Personnel Availability
- ☐ CCC - Conflicting Concurrent Cases
- ☐ OTR - Other

## ☐ Good Cause Not Demonstrated – Extension Not Granted

# VI. RATIONALE: (Describe the basis for your decision, and means of ensuring compliance within time granted.)

## Basis for Decision:

This is a complex fraud case involving other agencies. Additionally, respondent has acted as an expert for Psychology Bd in past & it is important to make sure that review is thorough & complete.

## Management Oversight to be Imposed: (Mandatory when extension granted)

Legal review to be completed in 30 days  
 Drafting of initiating document to be completed in 60 days (if appropriate)  
 Approval of AG's office to be completed in 90 days (if appropriate)

# VII. SIGNATURE:

L. A. Jenkins  
 NAME OF APPROVING AUTHORITY

[Signature]  
 SIGNATURE OF APPROVING AUTHORITY

10/19/99  
 DATE

## Staff Attorney Assignment Worksheet

Respondent Name: Brown, Laura

Case #(s): 98-10-0004PY

Program: Psychology

Received through CMT on: 9-14-99

### **ACTION REQUESTED:**

**DUE DATE:** 12-19-99

☐ Legal Review

☐ Draft SOA/STID

☒ Draft SOC

☐ NOC

☐ Below Threshold # \_\_\_\_\_

☐ Other: \_\_\_\_\_

Staff Attorney assigned:

MJG

MFY

BEC

JFK

Other assigned:

LLT

Date assigned:

9-16-99



ASI updated



TIMELINES updated

DEPARTMENT OF HEALTH  
HEALTH PROFESSIONS QUALITY ASSURANCE DIVISION  
UNIT 2

July 15, 1999

TO: Dr. Funabiki, Reviewing Board Member  
CC: Janice Boden, Program Manager  
FROM: Margaret Gilbert, Staff Attorney  
Subject: Request for case disposition recommendation  
98100004PY

---

Here is the file and case disposition summary and recommendation in this case.

This case should be presented to the Board for disposition decision at the August meeting. The other board members will be given a copy of the summary and recommendations at that time.

- Please let me know what your recommendation will be prior to the meeting so it can be included in the copy given the rest of the Board.
- If you cannot serve as RBM due to conflict, please notify me as soon as possible.
- If you will not be able to present the case at the meeting, let me know what your recommendation is and I will present it.

Please feel free to call me if you want to talk about the case. (360) 236-4913.

Thank you.

7/26/99  
Dr Funabiki received himself  
MG

## CASE DISPOSITION WORKSHEET

**Case Number:** 986100004PY

**Disposition summary**

Date prepared: June 30, 1999

Prepared by: Margaret J. Gilbert, Staff Attorney

**Facts:**

Respondent had two clients, #1 (CB) and #2(LB). They are not related.

#1 became a client in 1989 and continued until 1998. Issues were dealing with chronic illness, loss of professional license, and depression. Therapy occurred both in person and by telephone due to #1's illness, which limited travel.

#2 first became a "consultation client" in 1995 while living in another state. A disclosure was signed. Initial issues were dealing with prior therapist abuse and the legal proceedings related to that. Later, Respondent served as peer consultant to #2, another psychologist. Additionally, they collaborated on professional research. Respondent characterizes the relationship as collegial interaction and consultation.

In early 1997, #2 decided to move to Washington and Respondent encouraged the move. #2 was moving to the town where #1 lived. With consent of both clients, Respondent introduced #1 and #2. Ostensibly this was for the purpose of exchange of information about the area, but a friendship soon developed.

Respondent, #1, and #2 agree that a triangle of relationships soon ensued and was in full operations by late 1997. Dealing with the triangle became the focus of therapy with #1. Respondent considered the friendship between #1 and #2 to be harmful to #1. Respondent came to believe #2 was abusing both Respondent and #1. All three became very stressed. There was a flurry of e-mail correspondence seeking understanding, reconciliation, etc. #1 became depressed and resumed medication in late 1997 or early 1998. Eventually Respondent prepared a letter to #1 proposing alternatives: termination and suggesting other therapists, continuing therapy with limited focus, or taking time out. #1 did not receive the letter. Respondent refused to have further contact with #2 but did not formally terminate the relationship. After approximately May 1998, Respondent did not contact either #1 or #2.

Additionally, Respondent billed for more substantially more sessions than there are progress notes.

As a result of these deteriorating relationships and personal problems, Respondent has begun therapy and reduced practice hours and scope.

*1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent*

**Case Disposition panel and staff:**

Reviewing member:

*Barber*

Panel members:

*Board Junebleki  
recuses*

Margaret Gilbert, Staff Attorney + JKB

Panel meeting date:

*9/10*

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent

☐

Return to investigate these issues:

## Staff Attorney Assignment Worksheet

Respondent Name: Brown, Laura

Case #(s): 98-10-0004PY

Program: Psychology

Received through CMT on: 6-7-99

### **ACTION REQUESTED:**

**DUE DATE:** 6-21-99

☒ Legal Review

☐ Draft SOA/STID

☐ Draft SOC

☐ NOC

☐ Below Threshold # \_\_\_\_\_

☐ Other: \_\_\_\_\_

Staff Attorney assigned:

MJG

MFY

BEC

JFK

Date assigned:

6-8-99

☒ ASI updated

☒ TIMELINES updated



CMT done: 3/4/99  
Panel done: \_\_\_\_\_

## INITIAL ASSESSMENT WORKSHEET

**Case number** 99020006

**Basic licensing data:**

First licensed: 1979  
Current status: Active

| Prior Complaint | Disposition   | Subject type                                   |
|-----------------|---------------|--|
| 88020179        | Closed        | Unprofessional conduct-fraud/misrepresentation |
| 88060175        | Closed        | Unprofessional conduct-fraud/misrepresentation |
| 90110040        | Closed        | Unprofessional conduct-fraud/misrepresentation |
| 98010002        | CNA3          | Unprofessional conduct-failure to cooperate    |
| 98100004        | Investigation | Unprofessional conduct-questionable conduct    |

**Complaint summary**

Date prepared: **March 1, 1999**  
Prepared by: **Margaret J. Gilbert, Staff Attorney**

Respondent had been an expert witness when complainant sued a group of therapists for malpractice in 1996. Respondent referred complainant to another psychologist for therapy during that time.

The treating therapist allegedly behaved inappropriately in early 1999 (see complaint 99020005). Complainant contacted Respondent, who had previously supervised the psychologist. Respondent talked with the psychologist and talked and e-mailed with the complainant, attempting to work out "amends".

Complainant alleges Respondent should not have referred to the psychologist knowing her own problems (abuse) and the nature of the psychologist's earlier discipline (sex with client). Complainant feels Respondent was not objective because of having supervised the psychologist.

**Staff Assessment Analysis**

|   |
|---|
| 1. Does the Board have jurisdiction in this case?   |
| 2. Does the complaint allege a situation in which there is a possible violation of law or rule? What is it? |
| 3. Is the alleged violation above or below threshold limits established by the Board?                       |

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records o...

**Initial Assessment Recommendation**

☐  
☐  
☐  
☒

Close for no jurisdiction

Close for no possible violation presented

Close because below threshold (Reason = \_\_\_\_\_)

Investigate

Dissenting opinion from CMT was to close for no possible violation presented

**TO PRESERVE ANONYMITY  
THIS PAGE IS NOT TO BE SENT TO THE ASSESSMENT PANEL**

**Board Assessment Action**

**Initial Assessment Date:** \_\_\_\_\_

**Initial Assessment Team Members:**

*Prese*  
*Richeson*  
*Koepfer*  
Staff present:  
*Gilbert*

**Assessment Action:** (check one)

☐  
☐  
☐

Close, no jurisdiction

Close, no violation presented

Close, below threshold

Which criterion? \_\_\_\_\_



Investigate

**Post Assessment Information  
(revealed only to RBM if an investigation is done)**

**Respondent:**

**Complainant:**

**Other identifying information which could create conflict for RBM:**

**RBM assignment**

Based on the above "Post Assessment Information",

**Board Member** \_\_\_\_\_

☐  
☐

**WILL serve as RBM**

**WILL NOT serve as RBM. Recuse from further participation.**

**Initial Assessment Worksheet - page 3**

CMT done: 10/26  
Panel done: 11/2/98

### INITIAL ASSESSMENT WORKSHEET

**Case number** 98-10-0004PY

**Basic licensing data:**

First licensed: January 1979  
Current status: Active

| Prior Complaint | Disposition | Subject type                |
|-----------------|-------------|-----------------------------|
| 88020179        | Closed      | Unprof-misrep/fraud         |
| 88060175        | Closed      | Unprof-misrep/fraud         |
| 90010040        | Closed      | Unprof-misrep/fraud         |
| 98010002        | CNA3        | Unprof-failure to cooperate |

**Complaint summary**

Date prepared: October 21, 1998  
Prepared by: Margaret J. Gilbert, Staff Attorney

Complainant received therapy from Respondent from 1989 through 1998. Initial issues were suicidal depression related to major life crisis. Complainant states that in 1997 and with permission, Respondent introduced a third person who was interested in moving to Complainant's town. Complainant and the third person became friends. The relationship between Respondent and third person is not clear from the complaint -- there was a friendship but may have been a therapeutic relationship too.

Complainant alleges that a triangle relationship ensued, with boundaries violated, confidentiality violated, role reversal, abandonment, and imposition of new issues for complainant resulting in return of depression. Further, complainant alleges there was Medicare fraud as well as practice while judgment impaired by the relationship.

**Staff Assessment Analysis**

|   |
|---|
| 1. Does the Board have jurisdiction in this case?   |
| 2. Does the complaint allege a situation in which there is a possible violation of law or rule? What is it? |
| 3. Is the alleged violation above or below threshold limits established by the Board?                       |

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecti...

### **Initial Assessment Recommendation**

- ☐ Close for no jurisdiction
- ☐ Close for no possible violation presented
- ☐ Close because below threshold (Reason = \_\_\_\_\_)
- ☒ Investigate

1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent

**TO PRESERVE ANONYMITY  
THIS PAGE IS NOT TO BE SENT TO THE ASSESSMENT PANEL**

**Board Assessment Action**

**Initial Assessment Date:** 11/2

**Initial Assessment Team Members:**

*Ito  
Frese  
Richeson*

**Staff present:**

*Gilbert*

**Assessment Action: (check one)**

- ☐ Close, no jurisdiction  
☐ Close, no violation presented  
☐ Close, below threshold  
Which criterion? \_\_\_\_\_



1 - Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of ...

**Respondent**

**Complainant:** 8 - Name - Whistleblower Regarding Health Ca...

**Other identifying information which could create conflict for RBM:**

*Es prominent influence in sex abuse victim treat. Pt Townsend &*

*of therapy  
probably.*

*Seattle*

**RBM assignment**

Based on the above "Post Assessment Information",

**Board Member** \_\_\_\_\_

- ☐ WILL serve as RBM  
☐ WILL NOT serve as RBM. Recuse from further participation.

**Initial Assessment Worksheet - page 3**











telnet (WA-RS6000-1)

```

          AAAAAA      SSSSSS      IIIIIIIIIII
          AAAAAAA      SSS  SSS      IIIIIIIIIII
          AAAAAAAA      SSS   SSS      III
EXAMINING BOARD OF PSYCH  ASSESSMENT SYSTEMS, INC.      10-20-98
ses3303                      REAL SYSTEM      V2.5.18      10:05:29 AM
INDIVIDUAL NAME      (JR,SR,III)      REFERENCE # PY00000615
    LAST BROWN      SOC SEC NUM      -   -
    FIRST LAURA
    MIDDLE S
RESIDENCE INFORMATION
1527 1ST AVE NE
SEATTLE WA  98105
+--ADDITIONAL INFORMATION-----+
                                SEX F =      MARRIED      =
                                OTHER NAME
                                CORP. OFFICER      =
                                TRUST ACCOUNT
                                BIRTH PLACE
                                DATE 12-24-1952
                                SCHOOL CODE
                                CE UNITS      0.00 REQD BY 12-24-2000
+-----+
NOTES
AUDITED IN 1991, 1994, 1997
+-----+
CURRENT STATUS: ALE  EXPIRATION DATE: 12-24-1998  FIRST ISSUE DATE: 01-09-1979
RENEWAL STATUS: Z   LAST ACTIVE DATE:      -   -   LAST RENEWAL DATE: 11-06-1997
COMPLAINTS O/C:  0/ 3      AUTHORITY:
+-----+
1GO BACK  2NAM&ADDR 3EDUCATE  4LIC FUNC 5INVESTG  6      7OTHR DAT 8EXTD NOT
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telnet (WA-RS6000-1)

AAAAAA SSSSSS IIIIIIIIIII  
AAAAAAA SSS SSS IIIIIIIIIII  
AAAAAAA SSS SSS III  
EXAMINING BOARD OF PSYCH ASSESSMENT SYSTEMS, INC. 10-20-98  
ses3303 REAL SYSTEM V2.5.18 10:05:11 AM

| CASE<br>NUMBER | COMPLAINANT | COMPLAINT<br>DATE | INVESTIGATOR | TYPE | STATUS |
|----------------|-------------|-------------------|--------------|------|--------|
| 88020179       |             | 02-18-1988        |              | 25   | CLOSED |
| 88060175       |             | 06-14-1988        | JIM JACKSON  | 25   | CLOSED |
| 90110040       |             | 11-07-1990        |              | 25   | CLOSED |
| 98010002       |             | 01-05-1998        |              | 20   | CNA3   |
| 98100004       |             | 10-20-1998        |              | 34   | ASSESS |

1GO BACK 2 MORE 3CNG ENTR 4NEW ENTR 5DEL ENTR 6 7 TOP 8PRT ENTR

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: 99-12-A-1016 PY

Date Opened: 10/20/1998

Date Closed:

Total Days As of 11/20/2001: 1127

Current Step = Adjudication Process

| Step Name            | Step Start                     | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step            |
|----------------------|--------------------------------|------------|------------|-----------|-------------|-----------|-------------|----------------------|
| Intake/Assess        | 10/20/1998                     | 11/02/1998 | 11/10/1998 | 21        | 0           | 13        | 8           | Investigation        |
| Investigation        | 01/03/2000                     | 03/13/2000 | 06/06/2000 | -47       | 202         | 70        | 85          | Case Disposition     |
|                      | 11/02/1998                     | 06/07/1999 | 04/21/1999 | 170       | 0           | 217       | -47         | Case Disposition     |
|                      | Investigation Sub Total        |            |            |           | 202         | 287       |             |                      |
| Case Disposition     | 03/13/2000                     | 06/20/2000 | 06/23/2000 | 14        | 88          | 99        | 3           | SOC-Receive Answer   |
|                      | 06/07/1999                     | 01/03/2000 | 01/17/2000 | 140       | 84          | 210       | 14          | Investigation        |
|                      | Case Disposition Sub Total     |            |            |           | 172         | 309       |             |                      |
| SOC-Receive Answer   | 10/10/2000                     | 10/30/2000 | 10/30/2000 | 20        | 0           | 20        | 0           | Produce Sched Order  |
|                      | 06/20/2000                     | 08/08/2000 | 08/09/2000 | 20        | 30          | 49        | 1           | Produce Sched Order  |
|                      | SOC-Receive Answer Sub Total   |            |            |           | 30          | 69        |             |                      |
| Produce Sched Order  | 11/09/2000                     | 11/21/2000 | 12/09/2000 | 30        | 0           | 12        | 18          | Adjudication Process |
|                      | 10/30/2000                     | 11/02/2000 | 11/29/2000 | 30        | 0           | 3         | 27          | Adjudication Process |
|                      | 08/08/2000                     | 08/24/2000 | 09/07/2000 | 30        | 0           | 16        | 14          | Adjudication Process |
|                      | Produce Sched Order Sub Total  |            |            |           | 0           | 31        |             |                      |
| Adjudication Process | 11/21/2000                     |            | 11/06/2001 | 180       | 170         | 364       | -14         |                      |
|                      | 11/02/2000                     | 11/09/2000 | 05/01/2001 | 180       | 0           | 7         | 173         | Produce Sched Order  |
|                      | 08/24/2000                     | 10/10/2000 | 04/01/2001 | 180       | 40          | 47        | 173         | SOC-Receive Answer   |
|                      | Adjudication Process Sub Total |            |            |           | 210         | 418       |             |                      |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 09/14/2000 2:16:37 PM

Page 1 of 1

Printed By MGilbert 09/14/2000 2:16:46 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 99-02-0006

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 02/25/1999

Date Closed:

Total Days As of 09/14/2000: 567

Current Step = Case Disposition

| Step Name        | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess    | 02/25/1999 | 03/08/1999 | 03/18/1999 | 21        | 0           | 11        | 10          | Investigation    |
| Investigation    | 03/08/1999 | 02/23/2000 | 05/18/2000 | 170       | 267         | 352       | 85          | Case Disposition |
| Case Disposition | 02/23/2000 |            | 09/10/2000 | 140       | 60          | 204       | -4          |                  |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 09/25/2000 4:41:48 PM

Page 1 of 1

Printed By MGilbert 09/25/2000 4:42:10 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 99-02-0006

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 02/25/1999

Date Closed:

Total Days As of 09/25/2000: 578

Current Step = Case Disposition

| Step Name        | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess    | 02/25/1999 | 03/08/1999 | 03/18/1999 | 21        | 0           | 11        | 10          | Investigation    |
| Investigation    | 03/08/1999 | 02/23/2000 | 05/18/2000 | 170       | 267         | 352       | 85          | Case Disposition |
| Case Disposition | 02/23/2000 |            | 10/10/2000 | 140       | 90          | 215       | 15          |                  |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 07/31/2000 10:54:59 AM

Page 1 of 1

Printed By RMathis 07/31/2000 10:55:02 AM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 99-02-0006

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 02/25/1999

Date Closed:

Total Days As of 07/31/2000: 522

Current Step = Case Disposition

| Step Name        | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess    | 02/25/1999 | 03/08/1999 | 03/18/1999 | 21        | 0           | 11        | 10          | Investigation    |
| Investigation    | 03/08/1999 | 02/23/2000 | 05/18/2000 | 170       | 267         | 352       | 85          | Case Disposition |
| Case Disposition | 02/23/2000 |            | 09/10/2000 | 140       | 60          | 159       | 41          |                  |





Health Profession Quality Assurance  
Individual Case Summary Report  
As of 07/12/2000 5:12:21 PM

Page 1 of 1

Printed By MGilbert 07/12/2000 5:12:29 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 99-02-0006

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 02/25/1999

Date Closed:

Total Days As of 07/12/2000: 503

Current Step = Case Disposition

| Step Name        | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess    | 02/25/1999 | 03/08/1999 | 03/18/1999 | 21        | 0           | 11        | 10          | Investigation    |
| Investigation    | 03/08/1999 | 02/23/2000 | 05/18/2000 | 170       | 267         | 352       | 85          | Case Disposition |
| Case Disposition | 02/23/2000 |            | 07/12/2000 | 140       | 0           | 140       | 0           |                  |



Health Profession Quality Assurance  
Timeline Case Summary Report  
As of 03/08/1999 8:44:41 AM

Page 1 of 1

Printed By MGilbert 03/08/1999 8:44:46 AM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 99-02-0006

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 02/25/1999

Date Closed:

Total Days As of 03/08/1999: 11

Current Step = Investigation

| Step Name     | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step     |
|---------------|------------|------------|------------|-----------|-------------|-----------|-------------|---------------|
| Intake/Assess | 02/25/1999 | 03/08/1999 | 03/18/1999 | 21        | 0           | 11        | 10          | Investigation |
| Investigation | 03/08/1999 |            | 08/25/1999 | 170       | 0           | 0         | 170         |               |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 02/22/2000 12:15:06 PM

Page 1 of 1

Printed By DMagby 02/22/2000 12:16:12 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 99-02-0006

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 02/25/1999

Date Closed:

Total Days As of 02/22/2000: 362

Current Step = Investigation

| Step Name     | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step     |
|---------------|------------|------------|------------|-----------|-------------|-----------|-------------|---------------|
| Intake/Assess | 02/25/1999 | 03/08/1999 | 03/18/1999 | 21        | 0           | 11        | 10          | Investigation |
| Investigation | 03/08/1999 |            | 02/21/2000 | 170       | 180         | 351       | -1          |               |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 05/17/2000 2:24:56 PM

Page 1 of 1

Printed By MGilbert 05/17/2000 2:25:01 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 10/20/1998

Date Closed:

Total Days As of 05/17/2000: 575

Current Step = Case Disposition

| Step Name                  | Step Start | Step End   | Step Due   | Auth Days | Extend Days           | Days Used | Days Remain | Next Step        |
|----------------------------|------------|------------|------------|-----------|-----------------------|-----------|-------------|------------------|
| Intake/Assess              | 10/20/1998 | 11/02/1998 | 11/10/1998 | 21        | 0                     | 13        | 8           | Investigation    |
| Investigation              | 01/03/2000 | 03/13/2000 | 06/06/2000 | -47       | 202                   | 70        | 85          | Case Disposition |
|                            | 11/02/1998 | 06/07/1999 | 04/21/1999 | 170       | 0                     | 217       | -47         | Case Disposition |
| Investigation Sub Total    |            |            |            |           | 202                   | 287       |             |                  |
| Case Disposition           | 03/13/2000 |            | 05/24/2000 | 14        | 58 <i>grandfather</i> | 65        | 7           |                  |
|                            | 06/07/1999 | 01/03/2000 | 01/17/2000 | 140       | 84 <i>ED</i>          | 210       | 14          | Investigation    |
| Case Disposition Sub Total |            |            |            |           | 142                   | 275       |             |                  |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 05/24/2000 2:20:19 PM

Page 1 of 1

Printed By RMathis 05/24/2000 2:20:22 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 10/20/1998

Date Closed:

Total Days As of 05/24/2000: 582

Current Step = Case Disposition

| Step Name                  | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|----------------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess              | 10/20/1998 | 11/02/1998 | 11/10/1998 | 21        | 0           | 13        | 8           | Investigation    |
| Investigation              | 01/03/2000 | 03/13/2000 | 06/06/2000 | -47       | 202         | 70        | 85          | Case Disposition |
|                            | 11/02/1998 | 06/07/1999 | 04/21/1999 | 170       | 0           | 217       | -47         | Case Disposition |
| Investigation Sub Total    |            |            |            |           | 202         | 287       |             |                  |
| Case Disposition           | 03/13/2000 |            | 06/23/2000 | 14        | 88          | 72        | 30          |                  |
|                            | 06/07/1999 | 01/03/2000 | 01/17/2000 | 140       | 84          | 210       | 14          | Investigation    |
| Case Disposition Sub Total |            |            |            |           | 172         | 282       |             |                  |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 12/27/1999 12:54:12 PM

Page 1 of 1

Printed By MGilbert 12/27/1999 12:54:21 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 10/20/1998

Date Closed:

Total Days As of 12/27/1999: 433

Current Step = Case Disposition

| Step Name        | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess    | 10/20/1998 | 11/02/1998 | 11/10/1998 | 21        | 0           | 13        | 8           | Investigation    |
| Investigation    | 11/02/1998 | 06/07/1999 | 04/21/1999 | 170       | 0           | 217       | -47         | Case Disposition |
| Case Disposition | 06/07/1999 |            | 01/17/2000 | 140       | 84          | 203       | 21          |                  |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 10/26/1999 12:31:30 PM

Page 1 of 1

Printed By TTroutman 10/26/1999 12:31:36 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 10/20/1998

Date Closed:

Total Days As of 10/26/1999: 371

Current Step = Case Disposition

| Step Name        | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess    | 10/20/1998 | 11/02/1998 | 11/10/1998 | 21        | 0           | 13        | 8           | Investigation    |
| Investigation    | 11/02/1998 | 06/07/1999 | 04/21/1999 | 170       | 0           | 217       | -47         | Case Disposition |
| Case Disposition | 06/07/1999 |            | 01/17/2000 | 140       | 84          | 141       | 83          |                  |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 04/10/2000 9:06:45 AM

Page 1 of 1

Printed By MGilbert 04/10/2000 9:06:52 AM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 10/20/1998

Date Closed:

Total Days As of 04/10/2000: 538

Current Step = Case Disposition

| Step Name                  | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|----------------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess              | 10/20/1998 | 11/02/1998 | 11/10/1998 | 21        | 0           | 13        | 8           | Investigation    |
| Investigation              | 01/03/2000 | 03/13/2000 | 06/06/2000 | -47       | 202         | 70        | 85          | Case Disposition |
|                            | 11/02/1998 | 06/07/1999 | 04/21/1999 | 170       | 0           | 217       | -47         | Case Disposition |
| Investigation Sub Total    |            |            |            |           | 202         | 287       |             |                  |
| Case Disposition           | 03/13/2000 |            | 05/24/2000 | 14        | 58          | 28        | 44          |                  |
|                            | 06/07/1999 | 01/03/2000 | 01/17/2000 | 140       | 84          | 210       | 14          | Investigation    |
| Case Disposition Sub Total |            |            |            |           | 142         | 238       |             |                  |





Health Profession Quality Assurance  
Individual Case Summary Report  
As of 02/16/2000 3:48:39 PM

Page 1 of 1

Printed By DMagby 02/16/2000 3:48:47 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 10/20/1998

Date Closed:

Total Days As of 02/16/2000: 484

Current Step = Investigation

| Step Name               | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|-------------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess           | 10/20/1998 | 11/02/1998 | 11/10/1998 | 21        | 0           | 13        | 8           | Investigation    |
| Investigation           | 01/03/2000 |            | 02/15/2000 | -47       | 90          | 44        | -1          |                  |
|                         | 11/02/1998 | 06/07/1999 | 04/21/1999 | 170       | 0           | 217       | -47         | Case Disposition |
| Investigation Sub Total |            |            |            |           | 90          | 261       |             |                  |
| Case Disposition        | 06/07/1999 | 01/03/2000 | 01/17/2000 | 140       | 84          | 210       | 14          | Investigation    |



Health Profession Quality Assurance  
Individual Case Summary Report  
As of 01/05/2000 2:54:05 PM

Page 1 of 1

Printed By RBogart 01/05/2000 2:54:12 PM

Profession: Psychology

License #: PY00000615

Name : Brown, Laura S

Case #: 98-10-0004

Description: Unprof - Questionable Conduct

Docket #: N/A

Date Opened: 10/20/1998

Date Closed:

Total Days As of 01/05/2000: 442

Current Step = Case Disposition

| Step Name        | Step Start | Step End   | Step Due   | Auth Days | Extend Days | Days Used | Days Remain | Next Step        |
|------------------|------------|------------|------------|-----------|-------------|-----------|-------------|------------------|
| Intake/Assess    | 10/20/1998 | 11/02/1998 | 11/10/1998 | 21        | 0           | 13        | 8           | Investigation    |
| Investigation    | 11/02/1998 | 06/07/1999 | 04/21/1999 | 170       | 0           | 217       | -47         | Case Disposition |
| Case Disposition | 06/07/1999 |            | 01/17/2000 | 140       | 84          | 212       | 12          |                  |

**DEPARTMENT OF HEALTH  
HEALTH PROFESSIONS QUALITY ASSURANCE DIVISION**

**CONFIDENTIAL INVESTIGATION REPORT  
PREPARED FOR THE  
EXAMINING BOARD OF PSYCHOLOGY**

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**Case # 98-10-0004PY**

**RESPONDENT: Laura S. Brown, Ph.D.**

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**Investigator: Gary Reed  
Supervising Investigator**

**APPROVED BY**

*David Nagy*

**DATE**

*6/7/99*

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**APPENDIX A**

**RESPONDENT INFORMATION**

**NAME:** Laura S. Brown, Ph.D.

**BUSINESS ADDRESS:** 4527 1<sup>st</sup> Avenue NE  
Seattle, WA 98105

**BUSINESS TELEPHONE #:** 206-633-2405

**RESIDENCE ADDRESS:** Omitted

**RESIDENCE TELEPHONE #:** Omitted

**LICENSE NUMBER:** PY00000615

**DATE ISSUED:** 01-09-79

**EXPIRATION DATE:** 12-24-99

**BIRTH DATE:** 12-24-52

**SPECIALIZATION:** Psychologist

**PREVIOUS COMPLAINT HISTORY:** Yes – 3 closed complaints, 2 in 1988 and 1 in 1990.

**ATTORNEY IDENTIFICATION:** James E. Lobsenz  
Carney, Badley, Smith & Spellman  
701 Fifth Avenue, Suite 2200  
Seattle, WA 98104-7091  
206-622-8020

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**APPENDIX B**

**COMPLAINANT INFORMATION**

**NAME:**

**BUSINESS ADDRESS:**

**BUSINESS TELEPHONE # :**

**RESIDENCE ADDRESS:**

**RESIDENCE TELEPHONE # :**

*8 - Name - Whistleblower Regarding Health Care Provi...*

**ATTORNEY:** Unknown

**ATTORNEY ADDRESS:** N/A

**ATTORNEY TELEPHONE # :** N/A

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**APPENDIX C**

**CONTACT LIST**

**The Respondent contacted by telephone and mail.**

**The Complainant contacted in person.**

*7 - Mental health information, Adults - Information an...*

**Phoenix Mitchell  
4343 Haines Street  
Port Townsend, WA 98368  
360-385-1011**

**Rand Hawley and Cory Johnson, Special Agents  
U.S. Department of Health & Human Services  
Office of the Inspector General  
Office of Investigations  
PO Box 61220  
Seattle, WA 98121  
206-615-2260 & 2261**

**Mary Creeley, Health Care Investigator  
Department of Health  
Investigations Service Unit  
PO Box 47874  
Olympia, WA 98504-7874  
360-236-4656**

**Gary E. Reed, Supervising Investigator  
Department of Health  
Investigations Service Unit  
PO Box 47874  
Olympia, WA 98504-7874  
360-236-4658**

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## APPENDIX D

### GENERAL SUMMARY

#### **BACKGROUND – GENERAL ALLEGATIONS**

The complainant, [8 - Name - Whistleblower Regarding ...] received therapy from the respondent, Laura S. Brown, Ph.D., from 1989 through 1998. The initial issues were suicidal depression related to a major life crisis. The respondent introduced a 3<sup>rd</sup> person, [7 - Mental health information, Adults - Informatio...] who was interested in moving to the complainant's town, Port Townsend. [8 - Name - Whistleblo...] and [7 - Mental h...] became friends.

The complainant alleges that a triangle relationship ensued, with boundaries violated, confidentiality violated, role reversal, abandonment, and imposition of new issues for the complainant resulting in the return of depression. Further, the complainant alleges there was Medicare fraud, as well as practice while the respondent's judgment was impaired by the relationship. See a copy of the complainant on pages 1 to 9.

**NOTE** – For purposes of clarity I will try to summarize the evidence relating to each issue separately, before moving on to the next issue.

#### **ESTABLISHMENT OF A TREATMENT TRIANGLE**

##### **The Relationship**

The complainant alleged there had been an emotional relationship that had developed between herself, [5 - Health...] and Laura Brown. She referred to this relationship as a "triangle". During the subsequent interview with [7 - Mental...] and in Laura Brown's written statement each make reference to the "triangle" relationship.

The triangle relationship appeared to have developed when [8 - Name - Whistleblo...] started involving [7 - Mental ...] in her therapy with Laura Brown. According to the interviews conducted with [8 - Name - ...] [8 - Name ...] and [7 - Mental ...] they concurred that this was the beginning of the triangle. Laura Brown, in her written response, also offered this was the beginning of the triangle. Prior to this, there had been a professional collegial; therapeutic and friendship relationship between Laura Brown and [7 - Mental ...] as well as a professional and emotional relationship between Laura Brown and [8 - Nam...] [8 - Name - ...] After Laura Brown had put [7 - Mental ...] in touch with [8 - Name - Whistleblo...] over relocation issues, a friendly relationship developed between the two, [8 - Nam...] and [7 - Mental h...]

Laura Brown stated in her response that she had not been aware of the level of friendship that had developed between [8 - Nam...] and [7 - Mental ...] until [8 - Nam...] had started bringing the relationship up in her regular therapy sessions with her. Apparently [8 - Name ...] and [7 - Mental ...] would have difficulties in their relationship and [8 - Nam...] would want to discuss them in therapy. When Laura Brown mentioned this to [7 - Mental ...], [7 - Mental ...] stated she did not think it was appropriate to discuss the relationship of her and [8 - Nam...] because of the boundary issues. She also felt that Laura should not get involved due to her personal relationship with both of the women. According to [7 - Menta...]

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Laura responded that she was aware of the boundary issues and she didn't feel that this would be a problem in this case.

### **The Complainant's Viewpoint**

The complainant, 8 - Name - Whistleblower Regarding... relates that the respondent, Laura S. Brown, Ph.D., had a consultation client with whom she had developed a close friendship and a colleague relationship. This consultation client is 7 - Mental health information, Adults - Informati... The complainant notes the respondent was trying to persuade 7 - Mental... to move to Port Townsend from Georgia, and asked her permission to allow 7 - Mental ... to be in contact with her so she could tell her about Port Townsend. Also, the complainant represents the respondent encouraged her to make acquaintance with 7 - Mental... by telling her a lot about 7 - Mental h... what a neat person she is, and how much they had in common. The complainant relates she agreed to this and soon she and 7 - Mental h... were maintaining an e-mail correspondence. She says within a few months 7 - Mental ... and her family moved to Port Townsend and their friendship deepened. **See the complaint on page 2.**

The complainant states her relationship with the respondent remained unchanged through the summer and fall of 1997. Then, she relates that her relationship with 7 - Mental ... became painful for awhile because she was trying to force 7 - Mental... to play a role in her life (mother) that 7 - Mental ... was not prepared to do. The complainant makes it clear that 7 - Mental ... was not playing a therapist role; she says she was seeking emotional availability and nurturing from 7 - Mental ... as a friend. The complainant says she complained to the respondent a lot about 7 - Mental ... In turn, the complainant states the respondent talked to her a lot about 7 - Mental ...

The complainant states that 7 - Mental ... had a lot of fear about being pulled into her therapy. In fact, the complainant states 7 - Mental h... on several occasions asked to be left out of the complainant's therapy. However, the complainant contends that almost immediately the respondent put her in the middle between 7 - Mental... and herself due to relationship issues between 7 - Mental ... and the respondent, Laura Brown. Thus, the complainant contends the treatment triangle was established and the boundaries began breaking down. She believes it was the respondent's responsibility to see that a treatment triangle did not get established.

8 - Name - Whistleblo... wrote in her complaint " My experience with Laura have been so devastating to me that I have had a reemergence of all the problems I came to her with and now I have no therapist to help me deal with them". Throughout Ms. Brown's interview and at the conclusion she reiterated and confirmed that even with all of the problems she has encountered with Laura Brown her singular wish is to have Laura Brown as her therapist again. **See the complaint on page 2. See the memorandum to file regarding the complainant interview on pages 48 and 49.**

### 7 - Mental health information, Adults - Inf... **Viewpoint**

7 - Mental ... states she first met the respondent in 1995 when she became the respondent's consultation client from 01-95 until 11-96, and then intermittently from that time forward. **See a copy of the Psychoeducational Consultation Information Disclosure Statement on pages 74 to 77. Also, see copies of checks written to the respondent by 7 - Mental h... on pages 128 and 130. During this time 7 - Mental ... represents she and the respondent developed a close friendship, a research collaboration, and a mutual peer consulting relationship. **See 7 - Mental he...****

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7 - Mental health informati... **statement on page 56.** During the fall of 1996, 7 - Mental ... represents the respondent began encouraging her to move to Washington from Georgia for the purposes of the friendship and potential research collaboration. 7 - Mental ... relates the respondent said she would help her as a friend and colleague to start a new life away from the reminders of her past therapist. She says she took the respondent's suggestion to sell her home in Georgia her private practice , and move to Port Townsend with her family. **See the statement of** 7 - Mental he... 7 - Mental health infor... **Ph.D. on page 62.**

7 - Mental ... states that in a telephone call during 01-97, the respondent suggested she contact the complainant, 8 - Name - Whistleblo..., as a potential connection in Port Townsend and as a potential friend. 7 - Mental... says she expressed immediate concern about potential boundary problems, but was reassured by the respondent that due to her extensive experience of boundaries and ethics these would not occur. During 07-97, 7 - Mental ... relates she did indeed move to Port Townsend and she and the complainant became friends. **See the statement of** 7 - Mental health information, Adults - ... **Ph.D. on page 62.**

7 - Mental ... states there was a big change in 12-97. 7 - Mental ... says the boundaries began to dissolve. She relates that the complainant started having a hard time (suicidal). She says the dynamics at this point in time were the following: 8 - Name ... Laura – Laura/ 7 - Mental ... – 8 - Name... 7 - Mental ... 7 - Mental... represents that the respondent shared information with her about 8 - Name - Whistleblo... telling her it was OK to talk to her about 8 - Name... (What's happening). Also, at this time 8 - Name - Whistleblo... she says, was trying to use her 7 - Mental he... as a mother figure. 7 - Mental ... states she tried not to become involved with 8 - Name - ... treatment. 7 - Mental ... states the respondent tried to involve her in discussions about the complainant's therapy sessions. 7 - Mental ... represents she told the respondent she did not want to become involved as it was a boundary issue with her. Then, 7 - Mental ... says the respondent began changing her attitude toward 7 - Mental ... 7 - Mental ... related the respondent did not deal well when confronted or challenged, and would respond angrily or draw away. 7 - Mental ... says she kept confronting the respondent about the boundary issues, and the respondent became more hostile, erratic, and cruel toward her. At this point, 7 - Mental ... contends all knew and realized there was a triangle. **See the memorandum to file regarding the 01-15-99 interview of** 7 - Mental health information, Adults - Information a... **on page 53.**

7 - Mental ... relates that during the spring of 1998 and intermittently beforehand, the respondent's emotional impairment affected the accuracy of her perceptions of her and related events. 7 - Mental... claims the respondent encouraged both her and the complainant's emotional support. During the spring of 1998, she represents she had nearly daily contact with the respondent through telephone and e-mail. 7 - Mental ... says the respondent said she needed 7 - Mental ... and 8 - Name - ... at times and that it was a sign of growth that she allowed the intimacy that occurred as a result. However, 7 - Mental ... also states the respondent at times became extremely hostile and guarded blaming her for her problems, including her problems with her relationship with the complainant. She says the respondent flipped back and forth between these two positions. **See** 7 - Mental he... 7 - Mental health infor... **statement on page 57. See copies of the emails that** 7 - Mental h... **contends demonstrate the respondent's emotional problems and unprofessional conduct and her encouragement, and appreciation for emotional support that later she describes as intrusive on pages 84 to 95.**

### **The Respondent's Reply**

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The respondent states she did introduce the complainant to her colleague and former consultee 7 - Mental health information, Adults - Informati... She relates that 7 - Mental h... was considering moving to Port Townsend and the complainant lived in Port Townsend. The respondent says she had no intention of fostering any kind of relationship between 7 - Mental h... and the complainant. The respondent represents she asked the complainant if she would mind advising 7 - Mental h... about the pros and cons of living in Port Townsend, and the complainant agreed. **See the statement of the respondent on page 151.**

The respondent states she did not encourage the relationship between 7 - Mental ... and the complainant. She maintains they themselves developed the relationship and they were emotionally close before she knew what had happened. The respondent states that at that point she simply tried to be supportive of their relationship as she would in any similar circumstance. **See the respondent's statement on page 152.**

The respondent asserts she did not put the complainant between herself and 7 - Mental he... The respondent contends that the complainant and 7 - Mental ... placed her between them by bringing their concerns about each other to her. The respondent says it was never her desire to get involved in counseling 7 - Mental ... and the complainant about their relationship. The respondent states the complainant specifically directed her on numerous occasions to discuss her relationship with 7 - Mental... in what she believed was a helpful adjunct to her treatment. Also, the respondent contends the complainant had 7 - Mental... join her as a collateral in sessions. Additionally, the respondent notes that 7 - Mental ... freely made suggestions to both her and the complainant about issues that she required the complainant to work on in therapy in order to maintain her friendship with 8 - Name - W... **See the respondent's statement on pages 152 and 153. Also, see the respondent's attachment 2: e-mail from the complainant to her dated 09-05-97 on page 170.**

The respondent states the complainant and 7 - Mental health information, Adul... did not limit their relationship to the original intent of information exchange. The respondent says she trusted 7 - Mental ... 7 - Mental health in... not to interfere in the complainant's treatment. She states she did not anticipate 7 - Mental... would behave abusively toward the complainant. The respondent states she utilized an approach to treatment called feminist therapy which is a competency-based approach to treatment. Here she says emphasis is placed on the development of an egalitarian relationship in which the client's competence and authority are respected, and the client is empowered to be in charge of the direction of treatment, and her life choices. The respondent notes the role of the therapist is purposefully demystified, and therapists who practice this approach utilize self-disclosure and personal transparency, within clear boundaries, in order to assist in the equalizing of power dynamics in therapy. The respondent states this treatment approach worked well with the complainant until 7 - Mental health information, Adu... began to interfere in the therapy. **See the respondent's statement on page 158.**

## **DISSOLVING BOUNDARIES – CONFIDENTIALITY VIOLATED, ROLE REVERSAL, ABANDONMENT AND IMPOSITION OF NEW ISSUES FOR THE COMPLAINANT**

### **The Complainant**

The complainant says her relationship with the respondent as her therapist really did not change through the summer and fall of 1997. However, during 12-97 she states she began to have serious problems becoming suicidal for about 6 weeks. The complainant says she had to 98-10-0004PY / Laura S. Brown, Ph.D.

be put on medications by her family physician. The complainant indicates her relationship with 7 - Mental ... became painful because she was trying to force her into a mother role, which 7 - Mental h... did not wish to do. The complainant states 7 - Mental ... was not playing a therapist role however. She relates she talked with the respondent a lot about 7 - Mental ... and the respondent and 7 - Mental ... talked a lot about her. Thus, the complainant states she was put in the middle between the respondent and 7 - Mental ... She states the triangle was established and the boundaries began breaking down.

The complainant states she went to the respondent and told her she could not be a part of the triangle. She says she told the respondent she would continue to communicate with her and see her, but not as a therapist until she made things right with 7 - Mental h... She says the respondent agreed to everything. Also, she says she made it clear to the respondent that she was not terminating her as her therapist, just taking a time out. This was at a regular appointment during mid 02-98. The complainant was no longer being treated by the respondent during the latter part of 02-98.

Near the end of 02-98, the complainant says the respondent agreed to meet with 7 - Mental he... Phoenix (the complainant's partner) and herself to resolve problems between 7 - Mental... and Laura. They met in the office of the respondent's partner Miriam (who was in Europe). The complainant states she and her partner stayed in another room while 7 - Mental ... and the respondent talked. Toward the end of the meeting the complainant also went into the room, and says they comforted the respondent. She says she was kind of acting as the respondent's therapist, as the respondent was depressed and talking about problems she was having with her partner Miriam.

Also, the complainant says there was a lot of role reversal with her trying to help the respondent through e-mail conversations. Then, the respondent went to Europe for 3 weeks. The respondent was going to contact the complainant upon her return from Europe, but did not, so the complainant e-mailed her. The respondent did not reply to the complainant, and she has had no contact with the respondent since that time. The complainant says the respondent has just dropped her as a patient with no closure, and she really would like to have the respondent back as her therapist. See the memorandum to file regarding the interview of the complainant on pages 48 and 49.

7 - Mental health information, Adults - I...

7 - Mental ... states there was a big change in 12-97. 7 - Mental ... says the boundaries began to dissolve. She relates that 8 - Name - Whistleblower Regardi... started having a hard time (suicidal). She says the dynamics at this point in time were the following: 8 - Nam.../Laura - Laura 7 - Mental h... - 8 - Name - ... 7 - Mental ... 7 - Mental ... represents that the respondent shared information with her about 8 - Name - Whistleblo... telling her it was OK to talk to her about 8 - Nam... (What's happening). Also, at this time 8 - Name - Whistleblo... was trying to use 7 - Mental ... as a mother figure. 7 - Mental... states she tried not to become involved with 8 - Name - ... treatment. 7 - Mental... states the respondent tried to involve her in discussions about 8 - Name - Whistleblowe... therapy sessions. 7 - Mental ... told the respondent she did not want to become involved as it was a boundary issue with her. 7 - Mental ... related the respondent did not deal well when confronted or challenged, and would respond angrily or draw away. Laura began changing her attitude toward 7 - Mental ... 7 - Mental... says she kept confronting the respondent about the boundary issues, and the respondent became more hostile, erratic, and cruel toward her. At this point, 7 - Menta... contends all knew and realized there was a triangle.

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7 - Mental... represents that the respondent became out of touch with what was going on. She says the respondent's behavior became strange, and she was going down hill. She says the respondent would vacillate between anger, withdrawal, and confiding in her. 7 - Mental ... explains she had to put her own problems aside to try and be there for the respondent. 7 - Mental... states she still needed the respondent as a client/colleague/friend, and 8 - Nam... still needed the respondent as her therapist.

7 - Mental ... states they decided she and Laura needed to talk. She says 8 - Name - Whistleblo... requested a meeting between the respondent and 7 - Mental... to try and help them reunite their friendship/relationship. 7 - Mental... states that in late 02-98, 8 - Name - Whistleblower Regardi... she and 8 - Name - ... partner Phoenix went to the respondent's partners office. Phoenix and 8 - Name... stayed in another room while the respondent and 7 - Mental... talked. 7 - Mental... states the respondent told her how badly she was doing. 7 - Mental... related she felt that the respondent was losing it. 7 - Mental ... says she felt very loving toward the respondent and asked if she wanted a hug. The respondent said yes. 7 - Mental... thought the respondent was getting over her paranoia with her. 7 - Mental... states 8 - Name ... 7 - Mental... came into the room, and 8 - Name... and 7 - Mental... cared for the respondent. 7 - Mental ... states the respondent was the one in need of help. 7 - Mental... states she did hold the respondent for while because the respondent was feeling dependent on her. Laura, per 7 - Mental ... agreed to get help.

7 - Mental ... says 8 - Name - Whistleblo... told her that the respondent talked about their consultation/client relationship in 1995 to demonstrate to 8 - Nam... what was wrong with 7 - Mental ... 7 - Mental ... indicated she felt like she was on a roller coaster between 02-98 and 04-98. In early 04-98, the respondent came to 8 - Name - Whistleblower ... home (she says the respondent begged to come over) to talk with 7 - Mental... 7 - Mental... says the respondent was crying and apologized, and stated it was her causing the problems, not 7 - Mental ... 7 - Mental health infor... she felt very emotionally battered. 7 - Mental ... represents the respondent said she needed 7 - Mental... and 8 - Name - ... help.

Next, 7 - Mental ... says the respondent went to Europe for 3 weeks. Upon returning 7 - Mental ... states the respondent said she would contact her. 7 - Mental ... says the respondent did not contact her or 8 - Name - Whistleblo..., so 8 - Name ... e-mailed the respondent. 7 - Mental... says 8 - Nam... told her the respondent said to save herself she had to get rid of 7 - Mental... The respondent informed 8 - Name... she had had a religious experience in one of the holocaust camps. 7 - Mental... felt the ship was really going down at this point.

7 - Mental ... says the respondent faxed a letter to her, and 7 - Mental ... e-mailed the respondent to try and work it out. At that time, 7 - Mental... says the respondent told her she had told her partner Miriam about everything. 7 - Mental... says she suggested they talk in person, and they subsequently met in Edmonds during 07-98 at the ferry dock. 7 - Mental... says the respondent told her she had seen a therapist once or twice. 7 - Mental... stated the respondent, in her opinion, was in extremely bad shape and had lost weight. 7 - Mental... goes on to say she felt the respondent could intermittently hear and not hear. 7 - Mental ... says she got up to stand in the sun, then 7 - Mental... suggested to the respondent they both stand in the sun. She says the respondent was still sitting on the curb tracing a picture of a salmon with her finger. 7 - Mental h... states the respondent told her she was going to terminate 8 - Name - Whistleblo... as a client to solve her problems. Then, 7 - Menta... says the respondent agreed to meet again.

7 - Mental he... says they never met again, but there was a phone call after their Edmond's meeting. She says the respondent apologized and agreed to meet at the end of 07-98. After that, 7 - Mental... says the respondent cut off her e-mail and that is how she ended everything. See the

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memorandum to file regarding the interview of [7 - Mental health information, Adults ...], Ph.D. on pages 52 to 55. See the statement of [7 - Mental health information, Adults ...] Ph.D. on pages 56 to 72, and the accompanying attachments on pages 74 to 121.

### Phoenix Mitchell

At some point in the winter of 1997 – 98 Phoenix Mitchell states her partner [8 - Name - Whistleblow...] the complainant, started becoming extremely depressed, and started saying things such as things had gone sour and wrong. She says [8 - Name...] mentioned Laura Brown and [7 - Mental health information, Adult...] a lot. She believes that interpersonally the communication among Laura Brown, [8 - Name - Whistleblo...] and [7 - Mental health information, Adult...] had gotten bad. She believes [8 - Name - Whistleblower ...] depression was due to the overlapping relationships between Laura and [7 - Mental ...] and Laura and [8 - Name ...] Phoenix represents she discussed the problems with her because [8 - Name...] was suicidal. Once, she says, when talking with Laura Brown on the telephone Laura started talking badly about [7 - Mental h...] She says Laura claimed [7 - Mental...] was trying to put her in a position to choose between [7 - Mental ...] and [8 - Name ...] See the memorandum to file regarding the interview of Phoenix Mitchell on page 131.

Phoenix says [8 - Name - Whistleblo...] was trying to help resolve the problems between Laura and [8 - Name - ...] putting on hold her own therapy. She says Laura blamed [7 - Mental ...] sometimes and sometimes blamed herself. Phoenix represents Laura Brown called once to get advice on how to get the relationship back with [8 - Name ...] Phoenix also relates accompanying [7 - Mental ...] and [8 - Nam...] to Laura Brown's office to try and resolve some of the problems so she could reconcile with [7 - Mental...] and [8 - Name ...] She relates the meeting was in Seattle in a basement office, and she says she and [8 - Nam...] waited outside the room while Laura Brown and [7 - Mental health information, Adult...] talked, and then with both [7 - Mental h...] and [8 - Name...] She says there was apparently some reconciliation between [7 - Mental...] and Laura. She indicates a couple more meetings were to take place, but never did. Phoenix says the last time she spoke with Laura Brown, Laura told her she loved [8 - Name ...] would fight for the relationship, but would not be involved with [7 - Mental...] anymore. Phoenix states soon after that telephone call, the respondent simply dropped [8 - Name...] with not even the courtesy of a formal termination. See the memorandum to file regarding the interview of Phoenix Mitchell on pages 131 and 132. Also, see her statement on pages 133 and 134.

### The Respondent

Laura Brown states she was [8 - Name - Whistleblow...] therapist from 07-89 until [8 - Name ...] removed herself from therapy with her in 03-98. She notes she treated [8 - Name...] for her depression arising from her loss of her medical license in 1988, and subsequently for the psychological sequelae of her chronic illness, Chronic Fatigue Immune Deficiency Syndrome. After 06-97, Laura Brown states she also treated [8 - Name - Whistleblo...] for the problems evoked by the behaviors of [7 - Mental h...] toward her. See the respondent's statement on page 151. Also, see copies of the therapy notes on pages 262 to 286.

The respondent, Laura Brown Ph.D. contends that what is missing from the complaint made against her is the context and certain facts about [7 - Mental health information, Adults - Inf...] another psychologist. She says [7 - Mental ...] s interference has had a profound impact on [8 - Name - Whistleblowe...] therapy. Laura states the plain fact is [7 - Mental...] has succeeded in manipulating [8 - Name - Whistleblo...] for her own purposes. Laura Brown acknowledges that she had a serious falling out with [7 - Mental ...] due to her becoming abusive both of [8 - Name ...] and then herself when she attempted to protect [8 - Name ...]

She says she does not want to have anything further to do with [7 - Mental ...] Laura Brown states, "But [7 - Mental health informatio...] has used [8 - Name - Whistleblo...] to attempt to coerce and control me; to try to force me to continue a relationship with her that I have chosen to end because I came to realize that [7 - Mental health informatio...] is highly abusive of those around her." See the respondent's statement on page 150.

Laura Brown states that [8 - Name - Whistleblo...] has been manipulated by [7 - Mental ...] so that she came to the point of insisting that she would not see her for any more therapy sessions unless she agreed to remain "friends" with [7 - Mental ...] Laura says she refused to be manipulated in this manner, but did put up with an unbelievable amount of abuse from [7 - Mental ...] before finally concluding she could no longer maintain any ties to [7 - Mental ...] See the respondent's statement on page 150.

Laura Brown spends some considerable effort in her written statement to describe [7 - Mental heal...] interference with her therapeutic relationship with [8 - Name - ...] I am at this point in the report simply going to quote directly from this part of Laura Brown's statement:

"[8 - Name - Whistleblo...] and [7 - Mental health informati...] did not limit their relationship to the original intent of information exchange. Had I realized that [7 - Mental health informati...] would become abusive to my client, I would not have ever made the connection in the first place. I would certainly have actively discouraged them from becoming anything more than two people exchanging information. I would have disregarded [8 - Name - ...] wishes and, deviated from my usual approach to treatment in which I respect clients' autonomy, and actively discouraged her from accepting [7 - Mental health information, ...] feedback and criticisms. I would have more quickly identified and confronted the abusiveness of [7 - Mental health information, ...] treatment of [8 - Name - ...], even when [8 - Name - ...] herself was not open to this interpretation.

I trusted [7 - Mental health informati...] not to interfere in [8 - Name - ...] treatment. I did not anticipate she would be abusive towards [8 - Name - ...] This was misplaced trust. I believed [7 - ...] [7 - Mental health in...] when she told me that her prior actions toward me that were difficult for me to handle were evidence of her PTSD. I did not allow myself to realize that while [7 - ...] [7 - Mental health in...] might have been a victim, she was also a persistent abuser with a trail of victims behind her.

I utilized an approach to treatment with [8 - Name - Whistleblo...] beginning immediately upon her beginning to work with me in 1989, that worked well until [7 - Mental health informati...] intervened. This approach, feminist therapy, is a competency-based approach to treatment. Emphasis is placed on the development of an egalitarian relationship in which the client's competence and authority are respected, and the client is empowered to be in charge of the direction of treatment, and her life choices. The role of the therapist is purposely demystified, and therapist who practice this approach utilize self-disclosure and personal transparency, within clear boundaries, in order to assist in the equalizing of power dynamics in therapy. This approach to treatment worked very well with [8 - Name - ...] [8 - Name - ...] until the time that [7 - Mental health informati...] began to interfere in the therapy in June of 1997. Prior to that time, [8 - Name - ...] made enormous strides. She had overcome a serious suicidal depression, had become able to be in an intimate relationship once more after having believed herself incapable of doing so, had reconciled with her parents, particularly her mother (especially important because her mother then died), and had been able to come to terms with the development of a serious chronic illness. Although

she needed a great deal of support, she was doing well and making clear progress in therapy.

I utilized self-disclosure at several points between February and June 1998. Consistent with the treatment strategy that had always worked well in the past to empower 8 - Name... and assist her in becoming more functional, I allowed her to be aware of some of my struggles in regard to 7 - Mental health informati... I did not assert the privilege of my role as a therapist to hide these struggles from her. When I disagreed with her, I did so respectfully, and used self-disclosure as a means of making clear that simply because our perspectives were different, I did not intend to invalidate hers. 7 - Mental health informatio... then instructed 8 - Name ... on how to interpret those struggles, e.g., as abusive to 7 - Mental health informatio... and evidence of my supposed insanity.

I did not identify 7 - Mental health information, ... treatment of me as abusive to me until it had gone on for several years and had a significant negative impact on me. I had long conceptualized her behaviors as evidence of severe PTSD arising from alleged abuses by a therapist. It took a long time for me to realize that, unlike any other person I had encountered in any role in my work or my life, she was not only someone who had perhaps been victimized. She was also an abuser. When I first began to seek consultation to deal with 7 - Mental health information, ... interference in 8 - Name - ... therapy, in January, 1998, one consultant, who had known her for many years, told me that 7 - Mental health informati... was known to be an abuser. I subsequently learned that she had behaved abusively to many people, and also that her abusive behaviors were not, as I had believed, confined to relationships in which she was the recipient of a service such as psychotherapy, or (as from me), consultation. Consequently, I was only able to terminate that relationship after it had affected me and my client adversely.

I protected 7 - Mental health informati... and her influence over 8 - Name - Whistleblo... by never revealing to 8 - Name - Whistleblo... the attacks that 7 - Mental health informati... made on her to me, or 7 - Mental health information, ... attempt to interfere in the therapy relationship when 8 - Name ... was at her most fragile and suicidal. 8 - Name ... consequently only knows 7 - Mental health information, ... perspective on what had happened between us. On those rare occasions when I did offer my perspective regarding 7 - Mental health information,... behavior towards me, 8 - Nam... actively rejected it.

I had tried to take a break from communication with 7 - Mental health informatio... in mid-February, 1998. I was attempting to move her out of the picture of 8 - Name - ... therapy, and give 8 - Name - ... time to recover and become less suicidal and fragile. I was attempting to reduce 7 - ... 7 - Mental health infor... importance to 8 - Name ... so that she would listen to the positive feedback about herself that she received from other friends, her partner Sharon Mitchell, and myself.

But when I did this, and succeeded for a few weeks in creating sufficient peace for 8 - Name ... to begin to recover and no longer be suicidal, 7 - Mental health informatio... engaged in the ultimate interference in the therapy. She approached 8 - Name - Whistleblo... and represented that she, 7 - Mental health informatio... would literally die from my not having contact with her. 7 - ... 7 - Mental health in... knew that 8 - Name ... as a former practicing physician, felt very strongly about saving people's lives, and that 8 - Name... had already engaged in heroic efforts to save 7 - ... 7 - Mental health inf... when the latter was suffering the effects of a relationship breakup in the fall

of 1997. Consequently, she knew that [8 - Name ...] was vulnerable to this kind of manipulation.

[8 - Nam...] then approached me in her therapy session to request/demand that I resume my own communication with [7 - Mental health informati...]. I told her I would try to respect her request to repair things with [7 - Mental health informati...] even though it pulled me back into the triangle again, putting myself in a lose-lose situation. This was because [8 - Name...] expressed that she could not continue in therapy with me should I not take care of [7 - Mental health informati...] as well, and I knew that she was in no position to lose me as her therapist at that juncture, a few weeks out from an episode of psychotic depression and suicidality. I did not challenge [8 - Name - Whistleblowe...] about-face on [7 - Mental health informati...] from seeing her as abusive to seeing her as someone whose life I was required, by [8 - Name ...] to save on behalf of [8 - Name - ...] welfare." See the respondent's statement on pages 158 to 160. Also, note that Laura Brown provides copies of e-mail attachments to her statement to support her position that [8 - Name - Whistleblow...] had intuition that [7 - Mental health information, ...] was being abusive to her – e-mail attachment 2 on page 170 and e-mail attachments 10 to 13 on pages 211 to 219.

In regard to breaking [8 - Name - Whistleblowe...] confidentiality, Laura Brown states she did not violate [8 - Name - ...] confidentiality to her partner, who is a therapist. Laura represents that [8 - Name...] has a longstanding relationship to her partner, and who prior to 1994 provided emergency coverage for her practice. Laura states [8 - Nam...] consented at that time to the release of information about her care and possible emergent needs to her partner Ms. Vogel as well as other professionals who backed up her practice. See the respondent's statement on pages 156 to 157.

In regard to having to reverse roles and help Laura, Laura Brown simply states she did not engage in role reversals with [8 - Name - Whistleblo...]. Rather, Laura represents [8 - Name...] demanded role reversals from her during the spring of 1998 as a sign of respect for her perspective. Laura says [8 - Name...] repeatedly offered her help to her so she could better relate to [7 - Mental health information, Adul...]. Laura states that the episodes she describes and materials she claims Laura discussed with her were not discussions she had. Laura states these are topics she discussed with [7 - Mental ...] or episodes that occurred with [7 - Mental health information, Adul...]. See the respondent's statement on page 157 and the e-mail attachment on page 179.

One of [8 - Name - Whistleblowe...] serious issues is that she feels Laura Brown abandoned her abruptly, without closure. Laura Brown states she did not abandon [8 - Name - Whistleblo...]. She says that even though [8 - Nam...] had dropped out of therapy during 03-98 and told her any further communications would be perceived as intrusive and coercive, Laura states she sent a letter dated 07-12-98 to which [8 - Name - ...] has not replied. In that letter, Laura explained that in her view the focus of therapy had to be on [8 - Nam...], and not on her relationship with her friend [7 - Mental health information, Adults ...]. Laura represents she gave [8 - Nam...] three options and the names and telephone numbers of other therapists in case she chose to make a change of therapist. See the respondent's statement on page 155. See a copy of the 07-12-98 letter on pages 177 to 178.

## MEDICARE FRAUD

### The complainant



8 - Name - Whistleblo... indicates that when she first went on Medicare in 1992 (due to disability), Laura Brown suggested that in order to keep her from having to pay her a copayment, Laura could just double bill Medicare, charging for twice as many visits as were actually made. 8 - Name - ... relates she was very uncomfortable with the plan, not only because it was fraudulent, but that Laura would be placing herself at great risk in her behalf. 8 - Name... represents Laura told her repeatedly that she could not be caught because Medicare just pooled all her billings and sent her a single check. 8 - Name ... states Laura also told her that the only person who could turn her in was 8 - Nam... 8 - Name... describes this billing scheme as something that placed a lot of guilt and burden upon her. See the complaint letter of 8 - Name - Whistleblower... on page 7.

8 - Name ... also states that Laura billed Medicare for amounts that were well in excess of her actual charges. She says Laura refused to bill her Medigap policy, which would have paid the co-payment for at least part of the year. 8 - Nam... relates learning from a person she spoke with at the Medicare Fraud hotline that Laura actually made more money double billing than if 8 - Name ... or her Medigap policy had paid the co-payment. See the complaint letter of 8 - Name - Whistleblower... on page 7.

At the interview of the complainant, this writer and Health Care Investigator Mary Creeley looked at some personal appointment calendars 8 - Name - ... had kept from 1992 through 1998 of all her appointments with Laura Brown, both in person and by phone. We took the calendars for 1996 and 1997 with us to make copies. The originals were returned to 8 - Name ... Also, we obtained the originals of 8 - Name - ... EOB's statements regarding Medicare from 1992 through 1998. We returned the originals to 8 - Name - ... after making copies.

In comparing the appointment calendars for 1996 and 1997 with the therapy notes for 8 - Nam... 8 - Name ... obtained through Laura Brown's attorney the appointment dates appear to match pretty consistently. However, in comparing the calendars and therapy notes with the EOB statements, many more sessions were billed. Several times during conversations with 8 - Name - ... 8 - Name ... she has pointed out that during 08-94 Laura Brown billed for sessions when she was on vacation. See the unsolicited, supplemental statement of 8 - Name - Whistleblower... on page 51.

### Phoenix Mitchell

During the interview with 8 - Name - ... partner, Phoenix Mitchell, and subsequently in her statement, Ms. Mitchell states that she knew that Laura Brown was overbilling Medicare. She says she saw the bills and knew they did not correspond to the schedule she observed. Phoenix relates she normally drove 8 - Name - Whistleblo... to her appointments with Laura Brown and waited during the session, as driving is difficult with 8 - Name - Whistleblower Re... Further, Phoenix states that Laura admitted as much in her hearing on more than one occasion even offering to bill one or both of us for imaginary sessions and kick back the cash. This is an offer Phoenix states she and 8 - Nam... refused. See the statement of Phoenix Mitchell on page 133.

### The Respondent's Reply

Laura Brown replies to 8 - Name - ... allegations regarding billings by saying 8 - Name... may have misunderstood or misremembered our conversation. Laura states it is standard policy to bill for time, beyond 10 minutes per week, spent with a client outside of regular sessions. Laura states that her standard "Psychotherapy Information Disclosure Statement" says the following:

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Emergency phone calls are normally free. However, if we regularly spend more than 10 minutes weekly on the phone, or if you leave regular long phone messages, I will bill you on a prorated basis for time talking on the phone and listening to long messages. **See the disclosure statement on pages 180 to 185.**

Laura Brown represents she spent considerable time out-of-session time with [8 - Name ...]. She says [8 - Name ...] often got support from her by telephone, and eventually, by e-mail. **See the respondent's statement on page 157.**

Laura states that at the time [8 - Name ...] went onto Medicare she expressed concern about how the non face-to-face (but clearly to them both psychotherapy) time would continue to be paid. Note – the out-of-session psychotherapy time does not appear to be noted on the therapy notes of Laura Brown. Laura Brown states she reassured [8 - Name ...] she would be able to bill for the out-of-session time as it accrued by simply billing an additional session as needed.

Laura notes that having Medicare pay for her therapy was something [8 - Name ...] felt shaming. She says [8 - Name ...] did not offer to provide Medigap information to her, and [8 - Name ...] did not ask to have the Medigap policy billed. **See the statement of the respondent on page 158.**

**Note –** when asked to provide her Medicare invoices, the respondent replied stating she no longer has any copies of her invoices. **See the letter from her attorney for details of the circumstances of their disappearance on pages 297 to 298.**

Further evidence regarding the allegation of fraud is not being pursued at this time due to *potential investigative action by another jurisdictional agency.*

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## APPENDIX E

### EVIDENCE & ATTACHMENTS

| <u>Page #'s</u> | <u>Description</u>  |
|-----------------|---|
| 1 to 10         | Letter of complaint from [8 - Name - Whistleblower Regarding Health Ca...]  |
| 11 to 41        | Copies of e-mails sent to the respondent by the complainant, attached to the letter of complaint.   |
| 42 to 46        | Copy of the complainant notification letter, confidentiality of identity waiver, 2 <sup>nd</sup> request on the waiver, and the signed waiver releasing identity.   |
| 47 to 47        | Copy of the respondent notification letter.   |
| 48 to 49        | Memorandum to file regarding the 01-15-99 interview of the respondent by this writer and Mary Creeley.  |
| 50 to 51        | Unsolicited statement received from the respondent in the mail on 04-27-99.   |
| 52 to 55        | Memorandum to file regarding the 01-15-99 interview of [7 - Mental health information, Adults - Informati...]<br>[7 - Ment...] by this writer and Mary Creeley.   |
| 56 to 72        | Statement requested of [7 - Mental health information, Adults - Informati...]   |
| 74 to 77        | Copy of the psychoeducational consultation Information Disclosure Statement between the respondent and [7 - Mental health information, Adults - Informati...]   |
| 78 to 80        | Note from [7 - Mental health information, Adults - Informati...] and a copy of a letter from the respondent to [8 - Name - Whistleblower Regarding Health Ca...] dated 03-31-95.  |
| 82 to 83        | Note from [7 - Mental health information, Adults - Informati...] and a copy of a letter from the respondent to a Board Attorney, Composite Board regarding [8 - Name - W...] complaint against a former therapist.  |
| 84 to 95        | Note from [7 - Mental health information, Adults - Informati...] and copies of e-mails she believes document the respondent's emotional problems and unprofessional conduct.  |
| 96 to 99        | Note from [7 - Mental health information, Adults - Informati...] and copies of statements including what she alleges are improperly levied charges by the respondent and her only note in the summer of 1996 when [7 - Mental ...] claims the respondent abandoned her. |
| 100 to 104      | Note from [7 - Mental health information, Adults - Informati...] and a copy of an e-mail open letter dated 02-21-98 to [7 - Mental health information, Adults - Informati...] and [8 - Name - Whistleblo...] from the respondent.                                       |
| 105 to 109      | Note from [7 - Mental health information, Adults - Informati...] and a copies of e-mails she believes document evidence of confusion & problems in the consultation relationship and that it was still officially happening.  |

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- 110 to 113 Note from [7 - Mental health information, Adults - Informa...] and copies of e-mails and faxes she believes document the respondent's emotional reversal after her trip to Europe.
- 114 to 117 Note and a copy of a letter from [7 - Mental health information, Adu...] requesting her research materials from the respondent and asking for resolution of the conference dilemma.
- 118 to 119 Note from [7 - Mental health information, Adults - Informati...] and a copy of an e-mail she says documents the respondent's first therapy appointment as 05-07-98.
- 120 to 121 Copies of documentation [7 - Mental health information, Adults - Informat...] believes documents a conference where she and the respondent were to present at and which the respondent cancelled, withheld documents and listed herself as first author.
- 122 to 126 Fax confirmation sheet, cover sheet, copy of a witness notification form, and the faxed form back signed and dated by [7 - Mental health information, Adults - Informati...]
- 127 to 128 A note from [7 - Mental health information, Adults - Informati...] and a copy of a check written to the respondent in 1997 relative to the issue of her continuing to be the respondent's consultation client.
- 129 to 130 A note from [7 - Mental health information, Adults - Informati...] and a copy of a check written to the respondent dated 02-25-98 she believes documents that she was still the respondent's consultation client.
- 131 to 132 Memorandum to file regarding the 01-15-99 interview of Phoenix Mitchell by this writer and Mary Creeley.
- 133 to 134 Statement requested from Phoenix Mitchell.
- 135 to 145 Fax cover sheet, confirmation sheet, and copy of the complaint from [8 - Name -...] [8 - Name -...] Ph.D. faxed to the then attorney for the respondent, zRoland Hofstedt.
- 146 to 147 Copy of the Letter of Cooperation sent to the respondent along with a copy of the complainant for her written reply and copies of therapy notes and medicare billings.
- 148 to 148 Notice of Appearance from the respondent's new attorney and letter granting the respondent an extension in which to reply to the complaint.
- 149 to 168 Cover letter from the respondent's attorney and the respondent's statement in reply to the allegations.
- 169 to 169 Attachment (1) that corresponds to the respondent's statement.
- 170 to 170 Attachment (2) that corresponds to the respondent's statement.
- 171 to 171 Attachment (3) that corresponds to the respondent's statement.
- 172 to 174 Attachment (4) that corresponds to the respondent's statement.

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|            |   |
|------------|---|
| 175 to 176 | Attachment (5) that corresponds to the respondent's statement.  |
| 177 to 178 | Attachment (6) that corresponds to the respondent's statement.  |
| 179 to 179 | Attachment (7) that corresponds to the respondent's statement.  |
| 180 to 185 | Attachment (8) that corresponds to the respondent's statement.  |
| 186 to 210 | Attachment (9) that corresponds to the respondent's statement.  |
| 211 to 211 | Attachment (10) that corresponds to the respondent's statement.   |
| 212 to 212 | Attachment (11) that corresponds to the respondent's statement.   |
| 213 to 218 | Attachment (12) that corresponds to the respondent's statement.   |
| 219 to 219 | Attachment (13) that corresponds to the respondent's statement.   |
| 220 to 220 | Attachment (14) that corresponds to the respondent's statement.   |
| 221 to 221 | Attachment (15) that corresponds to the respondent's statement.   |
| 222 to 222 | Attachment (16) that corresponds to the respondent's statement.   |
| 223 to 223 | Attachment (17) that corresponds to the respondent's statement.   |
| 224 to 241 | Attachment (18) that corresponds to the respondent's statement.   |
| 242 to 257 | Attachment (19) that corresponds to the respondent's statement.   |
| 258 to 260 | Attachment (20) that corresponds to the respondent's statement.   |
| 261 to 286 | Copies of the respondent's therapy notes regarding the complainant sent through the respondent's attorney to this writer.   |
| 287 to 295 | Copy of a letter from this writer sent to the respondent's attorney in regard to the therapy notes and the response from the respondent in and through her attorney, and a copy of the respondent's disclosure statement. |
| 296 to 298 | Copy of this writer's request to the respondent's attorney for copies of the respondent's medicare billings and the respondent's reply in and through her attorney stating she cannot locate the billings.                |
| 299 to 322 | Copies of the complainant's Medicare EOB's for 1992.  |
| 323 to 368 | Copies of the complainant's Medicare EOB's for 1993.  |
| 369 to 420 | Copies of the complainant's Medicare EOB's for 1994.  |

421 to 464      Copies of the complainant's Medicare EOB's for 1995.  
465 to 503      Copies of the complainant's Medicare EOB's for 1996.  
504 to 529      Copies of the complainant's Medicare EOB's for 1997.  
530 to 537      Copies of the complainant's Medicare EOB's for 1998.  
538 to 590      Copies of the complainant's personal appointment calendar sheets for 1996.  
591 to 643      Copies of the complainant's personal appointment calendar sheets for 1997.

**NOTE – The complainant has in her possession the original appointment calendar sheets covering 1992 through 1998.**

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**APPENDIX F**

**POSSIBLE VIOLATIONS**

1. **RCW 18.130.180 (4) Malpractice/negligence**
2. **RCW 18.130.180 (13) Misrepresentation or Fraud**
3. **WAC 246-924-356 Impaired Objectivity**
4. **WAC 246-924-357 Multiple Relationships**
5. **WAC 246-924-359 (2) Client Welfare**
6. **WAC 246-924-363 Confidentiality**

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APPENDIX G

ACTIVITY REPORT

1. 11-06-98 Received call from respondent. Explained whistleblower to her.
2. 12-18-98 Received signed waiver releasing identity. Reviewing the complaint:  
Called complainant - Medicare is investigating - ATC to respondent - she is out of office from 12-18-98 to 01-04-99.
3. 12-23-98 Left message for respondent to call me when she returns on 01-04-99 to set up an interview appt., time, place and date. Respondent called - gave her name of complainant. Will set up appt. interview after the 1st of the year.
4. 01-04-99 Received call from complainant - checked history of complaints against respondent for her - 3 closed.
5. 01-06-99 Interview scheduled for 01-21-99 at 2 PM at Attorney Hofstedt's office on 9th and Cherry in Seattle. Will interview complainant and 2 other witness in Port Townsend at 1 PM on Friday 01-15-99.
6. 01-11-99 Reviewing complaint in preparation for Friday's interviews of complainant and 2 witnesses.
7. 01-13-99 Received call from respondent's attorney - requested copy of complaint. Faxed complaint to attorney Hofstedt to 206-467-2689.
8. 01-14-99 Reviewing for tomorrow's interviews.
9. 01-15-99 Went to Port Townsend and interviewed 3 witnesses. Left 8:30 AM and back 8 PM. Obtained appointment calendars from complainant for 1996 and 1997 and also EOB statements for 1992 through 1998.
10. 01-19-99 Returned call to her attorney - says he cannot represent her and her new attorney Jim Lobsenz will be in contact. Called complainant and told her the records are copied and being fed X'd to her. She says 7 - Mental ... is writing her statement.
11. 01-20-99 Drafting memorandum to file regarding the interview of 7 - Mental...  
7 - Mental health inf...
12. 01-22-99 Drafting memorandum to file regarding the interview of the complainant.
13. 01-25-99 Returned call to a witness. Is drafting statement. Sent LofC letter along with a copy of the complaint to the respondent for her reply and copies of therapy notes.
14. 01-28-99 Received call from respondent's attorney Jim Lobsenz, 206-622-8020. Asked for extension until 03-15-99 due to a criminal trial he is involved in. Reviewing evidence obtained thus far.
15. 02-01-99 7 - Mental ... called - she has her statement ready and is going to send in.
16. 02-11-99 Witness 7 - Mental health information, Adults - Infor... called and left me know her statement is being sent. She forgot to sign and send the Witness Notification form so I faxed her one and she will sign and return to us.
17. 02-12-99 Received statement and attachments from 7 - Mental health information, Adult... Review of same.



18. 03-02-99 Received a copy of a check from [7 - Mental health information, Adult...] which she says shows she continued to be the respondent's client in 1997. Called Phoenix Mitchell and she hopes to get her statement done pretty soon.
19. 03-11-99 Reviewing evidence in detail.
20. 03-15-99 Reviewed statement received from Phoenix Mitchell. Review of same.
21. 03-17-99 Called and left message for the respondent's attorney re: his client's statement and copies of the patient records and billings.
22. 03-18-99 Attorney called - needs until 04-15-99 to get statement of his client to me - says it is written by her but needs to be in chronological order and reviewed by him. Says he has some briefs in Appeals Court and Oral arguments in the Supreme Court and just simply cannot get this any sooner. He will send me copies of the therapy notes and the billings they can find today.
23. 03-19-99 Recived typed out notes that the respondent's attorney is saying are the respondent's therapy notes. Called and left message that unless these are copies of the original notes I will not accept them. Letter sent to the attorney for either declaration and/or copies of the handwritten notes. Review of notes.
24. 03-23-99 Received copies of 2 more checks written by [7 - Mental health information, Adult...] to the respondent documenting she was a client.
25. 04-05-99 Received reply from the respondent's attorney in regard to the records. He sent a copy of the disclosure statement as well.
26. 04-14-99 Received the respondent's statement and attachments. Beginning review of the lengthy, detailed response.
27. 04-16-99 Reading and reviewing the respondent's reply and attachments.
28. 04-19-99 Reviewing and organizing evidence.
29. 04-22-99 Witness [7 - Mental health info...] called to see if we needed anything further. Is thinking about filing a separate complaint maybe. Called Attorney Lobsenz - he will check with respondent regarding copies of billings to medicare and get back to me. Reviewing evidence to see what remains to tie up all loose ends.
30. 04-23-99 Reviewing evidence.
31. 04-29-99 Brief update to complainant. Received unsolicited statement from the complainant. Review of same.
32. 05-05-99 Drafted letter to Lobsenz for copies of respondent's medicare billings regarding [8 - Name - Whistleblo...]
33. 05-14-99 Called Medicaid Fraud and spoke with Mike Gregoire - he will check with Medicare agent to see if they have an investigation going on or not and get back to me.
34. 05-17-99 Reviewing and comparing the complainant's records re: her appointments and the respondent's records.
35. 05-19-99 Medicaid investigator Mike Gregoire called - gave me the name of Special Agent for Health & Human Services Rand Hawley info and he may call me. Reviewing therapy notes v. calendars from [8 - Name - Whistleblo...]
36. 05-20-99 Called Rand Hawley Special Agent Health & Human Services - he is going to check with his boss about assigning someone to the case and he will get back to me by the middle of next week. Reviewing the calendars, statements and session notes.

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37. 05-21-99 Called Rand Hawley, Special Agent Health & Human Services - will meet with him on Wed. 5-26-99 in Seattle. Called [8 - Name ...] and gave her his name and got her permission (verbally) to release whatever they want from her. Says in 08-94 Laura billed her for 8 sessions and she only had 2 sessions and then Laura was on vacation. Reviewing records and discussing with Chief Investigator.
38. 05-24-99 Discussed with Chief - get written request for copies of records Health & Human Services may want to copy.
39. 05-26-99 Went to Seattle and met with Special Agent with Health & Human Services re: medicare fraud issue.
40. 05-27-99 Returned call to Cory Johnson , Special Agent, Health & Human Services. They will subpoena me for information from our files. Discussed this issue with Chief Investigator, particularly with regard to the therapy notes. The complainant has already given verbal OK to release anything regarding her to Health & Human Services that they want or need.
41. 06-01-99 Discussed with staff attorney and then discussed with Chief.
42. 06-01-99 Organizing, assembling and numbering evidence. Working on report.
43. 06-02-99 Working on the investigation report.
44. 06-03-99 Working on the investigation report. Discussing the report with the Chief Investigator and Health Care Investigator Creeley.
45. 06-04-99 Completed investigation report.

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APPENDIX H  
REQUEST FOR INVESTIGATION

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Page 25 of 25 pages

COMPLAINT FORM

Department of Health  
Health Professions Quality Assurance Division  
Examining Board of Psychology  
Post Office Box 47869  
Olympia, WA 98504-7869

Your Name:

8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.0...

Address:

8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1)

City:

8 - Name - Whistleblower Regarding Health Car...

State:

8 - Name - Whistleb...

Zip:

8 - Name - Whistleblo...

Phone

8 - Name - Whistleblower Regarding Health Care Provider or ...

(daytime)

(evening)

Same

COMPLAINT INFORMATION

Please complete the following information concerning the individual(s) against whom you wish to register this complaint. This will help to avoid delay in processing your complaint. Please supply as much information as you can at this time. Thank you.

First and last name of person(s) your complaint is against:

Laura S. Brown Ph.D.

Address:

4527 First Ave. NE

City:

Seattle

State:

WA

Zip:

98105

Phone:

3 - DOH Licensee Health Professional Home Address and/or Home Phone Num...

Date(s) or time period of treatment or service.

Feb 3, 99 through Feb 8, 99

(did not see for treatment or service)

Have you discussed this complaint with the psychologist? YES ☒ NO ☐ If so, with what response?

Admitted to "not being objective"

If not, why?

Describe your specific complaint against the psychologist in the space below. Be as detailed as necessary to make the complaint clear and provide documentation of fees paid. You may attach additional sheets if necessary. You will be notified if any formal investigation is done on the complaint or if any disciplinary action is issued as a result of the complaint.

**NOTICE:** Please be aware that this written complaint may be released to the respondent(s) and may be used in a disciplinary hearing if such a hearing is conducted.

(in 1996)  
She was an expert witness for me during a lawsuit that involved therapist malpractice. During this time she referred me to Arthur W. Peskind Ph.D. for treatment of anxiety/panic. She had knowledge that Dr. Peskind had prior disciplinary action taken by the Dept. of Health.\* Being in a vulnerable state, she referred me to Dr. Peskind, who she was supervising at the time. I have been abused by Dr. Peskind since, and he admitted to the abuse. (Please see the Complaint I have filed concerning him along with emails I sent and received from Dr. Brown concerning this matter.

\* that was sexual in nature.

8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 4...

Date

Feb. 24, 99

To whom it may concern,

There are two separate complaints  
(1) Arthur W. Peskind Ph.D and (2)  
Laura S. Brown Ph.D. I would  
like these to be handled separately,  
but since the situation/complaint  
are closely related, I sent them together  
to hopefully make a complicated  
situation clearer. I have done  
my best to be concise and provide  
documentation concerning this matter.  
Please contact me with any questions.  
Thank-you.

Sincerely,

8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW ...

FEB 25 1999

HEALTH PROFESSIONS SECTION TWO

000003

Laura Brown Ph. D recommended Dr. Peskind to me. I mainly saw Dr. Peskind for the treatment of anxiety and panic disorder. Along with this treatment, both Dr. Peskind and Laura Brown where to be expert witnesses in a malpractice suit against a group of therapist.

Approximately the middle of November 1998, during one of my sessions while discussing my issues of incest. Dr. Peskind began to cry, regress (his body, appearance and demeanor was that of a child) and describe a time when he was a child and his father waking him in the night having him watch pornography and getting a "kick from watching him get aroused".

January 1999, Dr. Peskind asked me to "trust him" he wanted to get me sample of antidepressants. It was his intentions to get them for me and give them to me without a doctor prescription.

In January 1999, I made a comment about President Clinton and the media broadcasting his sexual life. Dr. Peskind stated that it "was better than ending up in the emergency room with a gerbil up your ass". I asked him what he was talking about. He described that "gay men put gerbils in their ass". I was shocked and I asked how someone could do that and he replied, "because it feels good". He then told me that "gerbils don't bite or mess their caves".

January 1999, Dr. Peskind described, in detail, of a pornography movie he viewed in a hotel room while in New York. In his words he stated, "A man was fucking two women and saying... You fucking bitch, you fucking bitch". He said that this disgusted him.

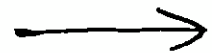
At the time these incidents where happening, Dr. Peskind was encouraging me to discontinuing my therapy with my other therapist because he felt she was "seducing" me and that she was the reason for my anxiety. I began to feel confused and suicidal.

February 3, 1999, I confronted him on his comments about the pornography he watched in New York, he told me that he and his wife really prefer to watch "erotica" that actually his wife "really likes erotica and how they watched the movie Deep Throat"---and another which I cannot remember the title. I then confronted Dr. Peskind on why he felt my other therapist was "seducing me" when what he was doing was more inappropriate. He explained that it is a "oath that all psychologist take that is 'to do no harm'". He told me that he felt that my other therapist was causing me harm and anxiety. I then reminded him about the comments he made about the gerbils, the regression and that he had no right to point the finger especially when he had a record with the state. He became defensive, turned white: his mouth was dry to the point he could hardly talk he was shaking. He told me about the complaint made to the Department of Health that the woman who made the complaint basically made him hold her...that his license was suspended and that Laura Brown Ph. D. supervised him when his license was reinstated. I asked him how Laura Brown could have referred me to him when I was going through a lawsuit and put me at risk with him. That it must have been some kind of joke for the both of them to denounce and be so outraged at what the therapists I was suing had done to me and then have me go to one who did the same thing. I told him that he had been lying to me and how betrayed and deceived I felt. Dr. Peskind then stated that he could no longer take "you statements" and that he wanted to end the therapy relationship with me. When we got up to leave he came towards me like he was going to hit me...or like he wanted to.

After this session, I contacted Dr. Brown and told her what happened. she said that he had been telling her that my therapy with him was going along really well. I told her that he was breaking my confidentiality because I specifically told him (after the lawsuit in 1996) that he was not to disclose information with her. I feel my confidentiality was breached.

On February 4, (the next day) Dr. Brown called and told me that Dr. Peskind had been calling her all night, crying. That he admitted to "everything" and that he wanted to make an amends...so could I "email what an amends would look like" to her that evening... she stated that she needed it because she was going to discuss this matter the next day. She went on to state that "this was an opportunity to experience someone harming me, in a sexual way, make an amends...that I never experienced that before...that this would be a good experience for me. I was devastated and got off the phone. I felt, once again, that my confidentiality was breached along with feeling in a state of shock and disbelief at her. (I have sent along with this complaint the emails, to and from, Dr. Brown concerning this situation with Dr. Peskind) I am filing a complaint against Dr. Brown for having knowledge of Dr. Peskind's prior compliant and record with the Department of Health and referring me to him after I had been abused and in the process of a lawsuit with therapist malpractice. This whole situation has left me devastated and in a state of shock. I feel betrayed and deceived.

Dr. Peskind has made other comments that are listed in the emails I sent along with this complaint.



JD 8-10-99

000004

Describe your specific complaint against the psychologist in the space below. Be as detailed as necessary to make the complaint clear and provide documentation of fees paid. You may attach additional sheets if necessary. You will be notified if any formal investigation is done on the complaint or if any disciplinary action is issued as a result of the complaint.

**NOTICE:** Please be aware that this written complaint may be released to the respondent(s) and may be used in a disciplinary hearing if such a hearing is conducted.

(in 1996)  
She was an expert witness for me during a lawsuit that involved therapist malpractice. During this time she referred me to Arthur W. Peskind Ph.D. for treatment of anxiety/panic. She had knowledge that Dr. Peskind had prior disciplinary action taken by the Dept. of Health.\* Being in a vulnerable state, she referred me to Dr. Peskind who she was supervising at the time. I have been abused by Dr. Peskind since, and he admitted to the abuse. (Please see the complaint I have filed concerning him along with emails I sent and received from Dr. Brown concerning this matter.)

\* That was sexual in nature.

8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1),...

Date



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
WHISTLEBLOWER RELEASE FORM

RECEIVED  
RECEIVED  
MAR 23 1999  
DEPARTMENT OF HEALTH  
INVESTIGATION SERVICE UNIT

RCW 43.70.075 provides in part: "The identity of a whistleblower who complains, in good faith, to the Department of Health about the improper quality of care by a health care provider, or in a health care facility, as defined in RCW 43.72.010 shall remain confidential..."

I understand that my identity is confidential pursuant to RCW 43.70.075 (DOH Whistleblower Statute). By signing this document, I waive my right to confidentiality and authorize the Department of Health to release my identity to Laura S. Brown, Ph.D., Respondent, to other persons who are reasonably necessary to the investigation, and for use in any subsequent administrative proceeding regarding my complaint. I understand that my identity will not be released for any other purpose.

APPROVAL OF CONFIDENTIALITY WAIVER

For the sole purpose of investigating my complaint and pursuing disciplinary/adverse action proceeding, I hereby waive confidentiality and consent to the release of my identity.

Signature \_\_\_\_\_  
Date: 3/23/99  
Home Phone: \_\_\_\_\_  
Day Phone: Same as above

8 - Name - Whistleblower Regarding Health Care Provider or Health Care F...

8 - Name - Whistleblower Regarding Health Care ...

DENIAL OF CONFIDENTIALITY WAIVER

I hereby deny my waiver of confidentiality and deny consent to release of my identity. I understand this denial may impair the Department of Health's ability to pursue disciplinary/adverse actions.

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Home Phone: \_\_\_\_\_  
Day Phone: \_\_\_\_\_

CASE #: 99-02-0006PY

RESPONDENT: Laura S. Brown, Ph.D.

000006

Subj: Re: (no subject)  
Date: 7/31/99 11:30:23 AM Pacific Daylight Time  
From: brownphd@compuserve.com (Laura S. Brown)  
Sender: brownphd@compuserve.com (Laura S. Brown)  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facil...

8 - Name - ... I'll be quite frank. This is harder to do since you filed a complaint against me. You placed me, by doing this, in a position adversarial to you, which I never wanted. This was your choice; and because of it, I did in fact decide, with the advice of consultants of my own, to not step one millimeter over any boundaries you had expressed to me. Thus, I have been unwilling to engage with Art about it because you were specific and clear that you forbade that.

You're asking me now to come back into a position of advocating on your behalf. I have to judge very carefully if this is something that I can now do.

---

Headers

Return-Path: <brownphd@compuserve.com>  
Received: from aol.com (rly-zc04.mail.aol.com [172.31.33.4]) by air-zc04.mail.aol.com (v60.18) with ESMTP; Sat, 31 Jul 1999 14:30:23 -0400  
Received: from spamgaad.compuserve.com (as-img-4.compuserve.com [149.174.217.147]) by rly-zc04.mx.aol.com (v60.18) with ESMTP; Sat, 31 Jul 1999 14:30:14 -0400  
Received: (from mailgate@localhost)  
by spamgaad.compuserve.com (8.9.3/8.9.3/SUN-1.3) id OAA24461  
for Eccl10@aol.com; Sat, 31 Jul 1999 14:30:13 -0400 (EDT)  
Date: Sat, 31 Jul 1999 14:29:47 -0400  
From: "Laura S. Brown" <brownphd@compuserve.com>  
Subject: Re: (no subject)  
Sender: "Laura S. Brown" <brownphd@compuserve.com>  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - ...  
Message-ID: <199907311430\_MC2-7F35-106@compuserve.com>  
MIME-Version: 1.0  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain;  
charset=ISO-8859-1  
Content-Disposition: inline

97D  
8-10-99

000007

Subj: Re: (no subject)  
Date: 7/31/99  
To: brownphd@compuserve.com

Laura,

I do not believe the fact that I filed a complaint against you and asked you not to discuss my case with Dr. Peskind absolves you of responsibility in this situation. You knowingly referred me, a victim of incest and therapist abuse, to a therapist with a history of client sexual abuse. Clearly you put me at grave risk. I believe it is your obligation to take what actions you can to set this matter right. Specifically, contacting Dr. Peskind and urging him to make the appropriate amends I have requested. Please remember, you assured me that he was "contrite" and sincerely wanted to make amends.

<< This is harder to do since you filed a complaint against me. You placed me, by doing this, in a position adversarial to you, which I never wanted. This was your choice; and because of it, I did in fact decide, with the advice of consultants of my own, to not step one millimeter over any boundaries you had expressed to me. >>

You now express reluctance to contact Dr. Peskind on my behalf and holding him accountable. You state I have put you in a difficult situation because I have file a complaint against you. I want you to understand what prompted me to file that complaint.

Initially when I informed you of Dr. Peskind's violation therapist/client boundaries, you express concern and outrage however, when you contacted me the following evening your tone had changed. You told me that "You already knew what happened (this is the exact same wording my family used about the incest) that he had been up all night crying calling you and that he wanted to make an amends." You then went to say "this is an opportunity for me to experience someone who sexually harmed me make an amends". You further went on to state, "that he feels bad about the situation". And you then wanted me to think about what kind of amends that you be. At this point I began to believe you were more interested in the protecting Dr. Peskind than my welfare. It was beyond me why you were saying these kind of statements and proclaiming to be an "expert in this field".

<< You're asking me now to come back into a position of advocating on your behalf. I have to judge very carefully if this is something that I can now do. >>

I understand that you may feel reluctant...but I want to make it very clear that you have professional responsibility to help in this situation since you referred me to Dr. Peskind, knowing his background and having been his supervising consultant. Besides this, it is an opportunity for you do your part in the amends.

JD  
8-10-99

000008

Subj: (no subject)  
Date: 7/31/99  
To: brownphd@compuserve.com

Dear Laura,

I am writing this to let you know that approximately 13 days ago I sent a letter to Art. (I assuming you know the contents). Frankly I'm disappointed. The letter was how I felt he could make an amends to me. On Feb. 4th, you stated in two separate emails that:

In a message dated 2/4/99 6:55:17 AM Pacific Standard Time, brownphd@compuserve.com writes:

<< I am expecting  
him to make a meaningful amends to you for his behavior. I asked you to  
think about what you would want from him that would feel like a real  
amends, not just a blow-you-off apology. >>

<< I have told him that I expect him to make amends to you, based on what you  
ask of him, and he has agreed to that. >>

I gave him 15 days to respond to the "what he could do to make an amends". It will be 15th day on Sunday. I asked him to make his amends in a "monetary form". I gave him the opportunity to respond without having my attorneys get evolved and then handled this situation handled in "civil court." To this date, he has not responded.

I remember you stating that you saw him as "rehabilitated" by stating the following reasons...these are your words:

<< several reasons. By the time I had made the referral, I had been reviewing  
his work for many years and he had been absolutely clean. I listened to tapes  
of all of his sessions. He had been genuinely contrite; he had not put the  
client through the misery of a lawsuit, he turned himself in. And I knew him  
to be excellent on panic disorder. And I knew that you had a primary therapist,  
and that he was only an adjunct- >>

I do not understand why he has not responded.

I want you to know that we had a brief conversation around the end of May or first of June. I just went to ask "why?" because I was grieving so badly. When we talked he was once again, dry mouthed, shaking and lying to me. He was trying to act in a patronizing matter—in other words like he was so concerned for me. He admitted to the "sexualized comments"...that he said them because of my interest in pornography and sex—he felt we were friends? (the sex and pornography I don't get). He went on to state that he "missed me and really liked talking to me on the phone and looked forward to it and now he was going to miss that". I once again asked him why he lied to me. "he said he never did". Yeah right. He then went on to talk about his sexual encounter with his former client stating that "he was wrong, but that he learned a lot (saying this in some nonchalant way) and when that woman complained to the state, he admitted everything" that "matter of fact, she had just wrote him a recent letter saying 'I hope there was no hard feelings and that she was okay'". First of all the state told me that there was no letter of complaint from that woman...so there he sat lying to me! And I knew it! I could not believe what I was hearing...here was this person who I thought was competent at one time and was trusted, at one time, lying to me and saying things only a "perpetrator" would say. He then went on to say he "wanted to make an amends to me"...I felt afraid of him...extremely afraid! And afraid for all the clients he sees. Furthermore, I thought there was another person in the building...there was a car in the parking lot. Laura, it was close to nine at night...there was no other person there!

I went there because I was in so much pain over the whole situation...I am torn up. I really thought and wished he would have said something that would have made that pain stop. When I sent the letter to him I didn't know I was going to experience horrible nightmares. I always thought what Passages did was so bad, but I know that what they did does not hold a candle to the betrayal, the hurt and disbelief at what he has done.

You said in an email to me, that "he had been genuinely contrite". Is this what you consider a "genuinely contrite" person to be? Did you lie too, when you said he was "willing to make an amends in whatever form that would be?"

000009  
8-10

Please feel free to write.

8 - Name - Whistleblower Reg...

JD  
8-10-99

000010

Subj: Re: (no subject)  
Date: 7/31/99  
To: brownphd@compuserve.com

In a message dated 7/31/99 7:44:15 AM Pacific Daylight Time, brownphd@compuserve.com writes:

<< I don't have any further information, since you requested that you not be a topic of conversation between myself and Art >>

I know that you do still discuss the situation...maybe my name is not mentioned. You did say that you "were going to continue to consult with him about the situation". You also said that you said,

<< have told him that I expect him to make amends to you, based on what you ask of him, and he has agreed to that. >>

So is this what you are going to do? You also said, "it was an opportunity for me to experience what it was like for someone sexually harrasing me to make an amends". I asked for my amends and I get ignored and then you seem to throw in my face about the "being the topic". Look, I know I have been the topic...what did you both do, push the situation under the carpet? Did he just magically stop talking about it hoping that I would just go away and do nothing? You both were the ones who brought up the "amends"...I guess I just thought that that would remain true...I mean after all you feel he is a "contrite" man. Are you "contrite" too?

If you want my permission to talk about this, you have it. I want to settle this matter with out an attorney and the "misery of a lawsuit" after all that basically is what information I picked up from our emailing. You said you were going to hold him accountable and I guess I expect that. I mean, after all you said you would. I would like some sort of closure so I can heal.

JD  
8-10-99

000011

Subj: (no subject)  
Date: 7/31/99 7:44:15 AM Pacific Daylight Time  
From: brownphd@compuserve.com (Laura S. Brown)  
Sender: brownphd@compuserve.com (Laura S. Brown)  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility...

8 - Name - ... I can only tell you that what I said when this originally occurred was as correct as I knew. I don't have any further information, since you requested that you not be a topic of conversation between myself and Art. I have not lied to you about anything under any circumstances.

----- Headers -----

Return-Path: <brownphd@compuserve.com>  
Received: from aol.com (rly-yd01.mail.aol.com [172.18.150.1]) by air-yd05.mail.aol.com (v60.18) with ESMTP; Sat, 31 Jul 1999 10:44:15 -0400  
Received: from spamgaae.compuserve.com (as-img-5.compuserve.com [149.174.217.148]) by rly-yd01.mx.aol.com (v60.18) with ESMTP; Sat, 31 Jul 1999 10:44:11 -0400  
Received: (from mailgate@localhost)  
by spamgaae.compuserve.com (8.9.3/8.9.3/SUN-1.3) id KAA09749  
for Eccl10@aol.com; Sat, 31 Jul 1999 10:44:10 -0400 (EDT)  
Date: Sat, 31 Jul 1999 10:43:43 -0400  
From: "Laura S. Brown" <brownphd@compuserve.com>  
Subject: (no subject)  
Sender: "Laura S. Brown" <brownphd@compuserve.com>  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - ...  
Message-ID: <199907311044\_MC2-7F17-16CA@compuserve.com>  
MIME-Version: 1.0  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain;  
charset=ISO-8859-1  
Content-Disposition: inline

JD  
8-10-99

000012

Subj: ?????????

Date: 2/8/99 6:07:40 AM Pacific Standard Time

From: brownphd@compuserve.com (Laura S. Brown)

Sender: brownphd@compuserve.com (Laura S. Brown)

To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facil...

This sounds about right; as I said, I'm not a perfect recaller of conversations. But this sounds about right.

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Headers

Return-Path: <brownphd@compuserve.com>

Received: from rly-zc05.mx.aol.com (rly-zc05.mail.aol.com [172.31.33.5]) by air-zc04.mail.aol.com (v56.24) with SMTP; Mon, 08 Feb 1999 09:07:40 1900

Received: from hil-img-7.compuserve.com (hil-img-7.compuserve.com [149.174.177.137]) by rly-zc05.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0)

with ESMTP id JAA21247 for 8 - Name - Whistleblower Regar...

Mon, 8 Feb 1999 09:07:37 -0500 (EST)

Received: (from mailgate@localhost)

by hil-img-7.compuserve.com (8.8.6/8.8.6/2.17) id JAA14254

for 8 - Name - Whistleblower ... ; Mon, 8 Feb 1999 09:07:39 -0500 (EST)

Date: Mon, 8 Feb 1999 09:07:22 -0500

From: "Laura S. Brown" <brownphd@compuserve.com>

Subject: ?????????

Sender: "Laura S. Brown" <brownphd@compuserve.com>

To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - ...

Message-ID: <199902080907\_MC2-69A5-A5B3@compuserve.com>

MIME-Version: 1.0

Content-Transfer-Encoding: quoted-printable

Content-Type: text/plain; charset=ISO-8859-1

Content-Disposition: inline

JD  
8-10-99

000013



Subj: ??????????  
Date: 2/7/99 11:49:53 PM Pacific Standard Time  
From: 8 - Name...  
To: brownphd@compuserve.com

I have a couple questions about the conversation we had over the phone last Wed. Feb. 3rd. I was just wondering if you could verify the following?

You said that Art had been up calling all you all night—that he feels bad. That he admitted to the "sexualized" statements and that he wanted to make an amends. You wanted me to think about that and email that you to Wed. Feb. 3rd. because you were going to talk to him the next day. I was angry and told you that I had to go to school and that I couldn't possibly do that that quickly. You told me that "This would be an opportunity to experience someone that harmed me omit that they did harm and make it right". When I told you that it seemed you were defending him, you said something like you "didn't really care about him and what he was going through".

When I emailed you to reiterate that conversation, these are statements you left out  
I'm sure of my recollection here...I know that I wording may be off some, but I would appreciate it if you would acknowledge that these are things you discussed with me/said...and I invite you to clarify any statements you made.

Thank you,

8 - Name - Whistlebl...

9D  
8-10-95

Subj: Re: Rosalie's so called "seduction"  
Date: 2/6/99 7:46:24 AM Pacific Standard Time  
From: brownphd@compuserve.com (Laura S. Brown)  
Sender: brownphd@compuserve.com (Laura S. Brown)  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility...

So I am doing that; believing in you. And trying hard to be up-front here  
and get Art called to account..

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Headers

Return-Path: <brownphd@compuserve.com>  
Received: from rly-yb05.mx.aol.com (rly-yb05.mail.aol.com [172.18.146.5]) by air-yb03.mail.aol.com  
(v56.24) with SMTP; Sat, 06 Feb 1999 10:46:24 -0500  
Received: from hil-img-7.compuserve.com (hil-img-7.compuserve.com [149.174.177.137])  
by rly-yb05.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0)  
with ESMTP id KAA10000 for 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility...  
Sat, 6 Feb 1999 10:46:23 -0500 (EST)  
Received: (from mailgate@localhost)  
by hil-img-7.compuserve.com (8.8.8/8.8.6/2.17) id KAA24630  
for 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility...; Sat, 6 Feb 1999 10:46:22 -0500 (EST)  
Date: Sat, 6 Feb 1999 10:45:32 -0500  
From: "Laura S. Brown" <brownphd@compuserve.com>  
Subject: Re: Rosalie's so called "seduction"  
Sender: "Laura S. Brown" <brownphd@compuserve.com>  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility...  
Message-ID: <199902061045\_MC2-697C-439C@compuserve.com>  
MIME-Version: 1.0  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain; charset=ISO-8859-1  
Content-Disposition: inline

JD  
8-10-99

Subj: Re: Rosalie's so called "seduction"  
Date: 2/5/99  
To: brownphd@compuserve.com

In a message dated 2/5/99 6:27:59 PM Pacific Standard Time, brownphd@compuserve.com writes:

<< So what can I do best for you that will not leave you being or feeling  
ganged up on and disbelieved? >>

What you can do is...believe in me.

Thank you for your honesty.

8 - Name - Whist...

JD  
8-10-55

000016

Subj: Fwd: Rosalie's so called "seduction"  
Date: 2/5/99 6:27:59 PM Pacific Standard Time  
From: brownphd@compuserve.com (Laura S. Brown)  
Sender: brownphd@compuserve.com (Laura S. Brown)  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - R...

You know, you're right; I'm too close to both of you here to be objective or to try to offer myself up as a third party who can make sense of what is going on.

I still want to get Art to take responsibility and make amends to you. And I still want to be open to hearing you and trying to be of support. But you are correct that I'm responding differently than I would if it were about someone I didn't know. And of course, I take you seriously, knowing you well.

So what can I do best for you that will not leave you being or feeling ganged up on and disbelieved?

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Headers

Return-Path: <brownphd@compuserve.com>  
Received: from rly-zd01.mx.aol.com (rly-zd01.mail.aol.com [172.31.33.225]) by air-zd02.mail.aol.com (v56.24) with SMTP; Fri, 05 Feb 1999 21:27:59 -0500  
Received: from arl-img-10.compuserve.com (arl-img-10.compuserve.com [149.174.217.140]) by rly-zd01.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0) with ESMTP id UAA07617 for 8 - Name - Whistleblower Regar...  
Fri, 5 Feb 1999 20:38:26 -0500 (EST)  
Received: (from mailgate@localhost) by arl-img-10.compuserve.com (8.8.6/8.8.6/2.17) id UAA10658 for Eccl10@aol.com; Fri, 5 Feb 1999 20:38:27 -0500 (EST)  
Date: Fri, 5 Feb 1999 20:37:12 -0500  
From: "Laura S. Brown" <brownphd@compuserve.com>  
Subject: Fwd: Rosalie's so called "seduction"  
Sender: "Laura S. Brown" <brownphd@compuserve.com>  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RC...  
Message-ID: <199902052038\_MC2-6977-2E03@compuserve.com>  
MIME-Version: 1.0  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain; charset=ISO-8859-1  
Content-Disposition: inline

JP  
8-10-99

Subj: Re: More Questions???  
Date: 2/5/99 7:45:15 AM Pacific Standard Time  
From: brownphd@compuserve.com (Laura S. Brown)  
Sender: brownphd@compuserve.com (Laura S. Brown)  
To: 8 - Name - Whistleblower Regarding Health Care Pro...

I was not comfortable hearing him call you "fat" —that was the point. I do not like the word to describe anyone...it's a prejudice comment. I told you it because it offends me...I didn't tell you that to inflame you. I feel once again like you are defending him...and to be honest, it does bother you deep down to be over weight...it's not okay to be called "fat" and to hear him use that term.

-I understand it's not comfortable for you. And actually, I am very ok with my size, it's not "over" the weight I want to be. We do have a very different experience of this. What I get is that this word offends you-

When I confronted him on Tuesday to be more clear what he meant by Rosalie's being "seductive", he explained that it was not meant to be sexual seduction but one of "inviting me in to be family" and then not being there...something like that. I knew he didn't mean it to be sexual. When he feels there was a "seductive element to Rosalie's dynamic with me" what about his own. He's quick to point the finger...what a hypocrite. He is obviously NOT the expert on boundaries as he has proven that twice. He knows that too. He's trying to trip you up.

-I wouldn't call him an expert on boundaries. And I will keep attentive-

It doesn't surprise me that he feel "clueless" to how I might "have interpreted any of this as sexualized" because he is unethically incompetent, sneaky and dishonest. He's trying to save his ass and is going to dupe you...he's ego and reputation is on the line. When one gets too evolved in ones "ego" one often loses sight and becomes "clueless" (this even goes as far as to what they used to represent and defend). You know better then to think one who perpetrates can be "rehabilitated".

-I guess we disagree on that last point. I think that some people can be rehabilitated, and some can't. But more importantly, no matter what, he has done something that has hurt you, and he has to repair it to you; this is not, in my mind, about saving his ass or his reputation.-

As far as the antidepressants...he was going to get them for me and give them to me. PERIOD.

-ok. I don't know how he would be able to do this, frankly. Literally, how this could happen-

It's strange...if this was not a therapist you knew or so called "rehabilitated" you would be enraged—out raged at the conduct...you would not hesitate to pass judgment. You would proclaim to be for the "victim" and stand up for their rights. My question is have you let your ego get in the way of your judgment? Have you lost sight of what is important to you and

Subj: Fwd: Rosalie's so called "seduction"  
Date: 2/5/99  
To: brownphd@compuserve.com

In a message dated 2/5/99 7:44:50 AM Pacific Standard Time, brownphd@compuserve.com writes:

<< -hmm, there is a communication problem here. He thinks you want to end the relationship. Do you want him to continue working with you? He thinks he was simply offering you the chance to leave if you wanted; and that clearly came across to you as being kicked out- >>

There is no communication problem here. What I was trying to communicate to you was that he was so defensive and impaired by his anxiety that he wanted it to seem that he was "kicking me out" or ending the so called therapy relationship. What I was trying to communicate with you is that, given the content and seriousness of the conversation/issue...a non-guilty competent therapist would have made every effort to work things out. I do not plan on seeing him again NOR think whatsoever that things could work out—he has abused me in many different levels. Why is this hard for you to understand? Look the guy was inappropriate and incompetent causing me harm and distress...I don't need to prove that to you!

The issue with the antidepressants...I have no idea where he was going to get them. What I know and believe to be true is he was going to get them for me and give them to me from what ever source—Believe it or not. You are being NOT being objective here. His wife is a psychiatrist and according to Art he's friends with a number of Doctors.

Once again, if this was another therapist I feel you would not be defending him like your doing. All you are doing is patronizing me and telling me that I misunderstood someone who has cause a lot of damage. It's like you don't want to believe that this is happening and undermining me. It also appears that your not being clean here also...why are you so afraid of what I'm saying?? You keep challenging my perceptions and it seems that you are undermining them...WHY???? You have the things he's done now...I gave you those for me and out of consideration for you because you seem to be confused/baffled/in denial? Or because you were supportive when talked last Tuesday evening. You told me that you believed me...that you knew him...that he couldn't lie to you...and that you were going to go after him then you do a 360 degree turn. You believe what you want—you weren't there!

8 - Name - Whist...

9D  
8-10-99

<HTML><FONT SIZE=3 PTSize=10>Subj: <B> Re: Rosalie's so called  
"seduction"</FONT><FONT SIZE=3 PTSize=10></B><BR>  
Date: 2/5/99 7:44:50 AM Pacific Standard Time<BR>  
From: brownphd@compuserve.com (Laura S. Brown)<BR>  
Sender: brownphd@compuserve.com (Laura S. Brown)<BR>  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care F...

</FONT><FONT SIZE=3 PTSize=10><BR>  
</FONT><FONT SIZE=3 PTSize=10><BR>

<BR>

<BR>

I first need to tell you that for some reason two blank emails  
got sent to<BR>  
you. I don't know how to use the new 4.0 America Online yet and  
when I hit<BR>

"reply" it sends the email before I have typed anything.  
Strange.<BR>

<BR>

-ah technology...-<BR>

<BR>

Anyway, I need to address this issue with Art saying that he  
feels Rosalie has<BR>

been seductive. I want to make very clear that I understood that  
he meant it<BR>

in a non-sexual way, although his wording could have been used  
differently.<BR>

Strong accusations as such have powerful impacts and one, who is  
supposed to<BR>

be a professional, is to be careful about wording.<BR>

<BR>

-I agree. This was a not-thoughtful use of wording, and given the  
other<BR>

context of what's been happening, it became more powerful and  
hurtful<BR>

for you-<BR>

<BR>

I do not feel Rosalie has been seductive. At the time he told me  
this was<BR>

during a period of time, approx. two weeks ago, when my issues  
were stirred<BR>

up. I was angry with Rosalie and trying to process that anger.  
What became<BR>

very confusing was Art not supporting me seeing her or working  
things out, nor<BR>

recognizing that I was literally experiencing flashbacks/triggers  
and<BR>

emotional. A lot was happening and he was validating my  
confusion as truths<BR>

which only made things more confusing and out-of-control for me.  
<BR>

<BR>

<BR>

-I get that; that he was thinking he was giving you validation  
and feeling<BR>

fine about it, and what you needed was to be heard, as a person  
who was<BR>

confused and in conflict and ambivalent, and needing open space  
in which<BR>

Laura's  
response

to explore that, without anyone supporting or encouraging any  
part of<BR>  
that ambivalence. Like he was so eager to show you that he was  
supportive<BR>  
that he knocked you off balance-<BR>

<BR>

<BR>

<BR>

What even<BR>

made things worse was he had always been supportive of Rosalie  
and me working<BR>

things out then he was telling me that she was "seducing me" and  
a contributor<BR>

to my anxiety and not to go back. He supported me not seeing her  
again and<BR>

told me to not give into the anxiety/grief at losing her as a  
therapist. It<BR>

would seem to me that if he was clean about his intentions, then  
he would have<BR>

made the efforts to help work things through with Rosalie...and  
if he had<BR>

issues with the way she was behaving or not doing her job...then  
he should<BR>

have consulted with her.<BR>

<BR>

-I agree with this point. -<BR>

<BR>

<BR>

I do not know how he can point the finger at her and say that she  
was messing<BR>

up, crossing boundaries, not listening, being inappropriate,<BR>  
seducing...whatever it is...when (1) she doesn't talk about her  
sexual life<BR>

with me nor mentions her husbands sexual experiences. (2) she  
has made<BR>

herself available to me when needed in the form of phone conv.  
and extra<BR>

appointments actually less than he has. (3) She doesn't make  
comments about<BR>

sex or talk about sexual things in nature that are not therapeutic  
(4) She<BR>

doesn't cry and regress during my sessions and talk about her  
incest issues.<BR>

(5) She has always wanted to work things out especially when I  
have<BR>

confronted her.. She doesn't go into panic like Art does and  
become defensive<BR>

and tell me that she "hopes I find help for myself and the  
anxiety" kick me<BR>

out when I confront her or am angry. (6) She doesn't say "it's  
okay to be<BR>

angry with me and then get defensive and fight back like he does.  
(7) I don't<BR>

believe that she lies to me. She is a honest woman full of  
integrity. When<BR>

brought to her attention something she is doing wrong, she  
admits. (8) She<BR>

Laura's  
response

8-10-95

JD



doesn't pose to "be an expert and go off on some ego trip. (9)  
she has<BR>

nothing to be guilty of. She knows her boundaries and keeps  
them...she's not<BR>

rigid and scared. (My instructor at school told me that "when a  
therapist<BR>

keeps rigid boundaries, it's not about protection for the client,  
it's because<BR>

they don't trust themselves").<BR>

<BR>

-You know, what you're saying about Rosalie is what I know to be  
true about<BR>

her, that she is an excellent and clear therapist. And that when  
things<BR>

happen between you and her that are confusing or triggering, the  
two of<BR>

you do eventually work them out. Seems like Art got into his  
"hero-rescue"<BR>

place and was heavy-handed, and did something very painful to you  
in<BR>

the process-<BR>

<BR>

<BR>

He has no right to be critical of her. The way he got when I  
confronted him<BR>

last Tuesday, shaking, dry mouth, turning white, cowering and  
being defensive<BR>

is just an example of not being competent. It was pathetic and  
if he had<BR>

nothing to be guilty of, then he wouldn't have responded in that  
manner. If<BR>

he had not been inappropriate then he would have worked things out  
instead of<BR>

saying we are ending this therapeutic relationship and by kicking  
me out of his<BR>

office. <BR>

<BR>

-hmm, there is a communication problem here. He thinks you want  
to end<BR>

the relationship. Do you want him to continue working with you?  
He thinks<BR>

he was simply offering you the chance to leave if you wanted; and  
that<BR>

clearly came across to you as being kicked out-<BR>

<BR>

<BR>

You see, Rosalie would have never done that, she would have  
worked<BR>

things out because she is clean, honest and competent enough to  
work things<BR>

through. she doesn't buckle when I am angry or confrontive.  
Needless to say,<BR>

it pisses me off that he's pointing the finger at her. You know  
the old<BR>

sadage, "when you point the finger at someone, you have three  
pointing back<BR>

straight at you". Once again, he has no right what-so-ever in being critical<BR> of another therapist!!! It is totally unethical for him to be telling or<BR> turning me against another therapist! This I know from the psych. class I<BR> dropped out of.<BR>

<BR>

-right; you needed him to give you the space to explore your feelings about<BR>

Rosalie, not to land with you on one part of the confusion.<BR>

<BR>

I think you're quite right that Art sees you as much more together than<BR>

you feel; and has done some things from this erroneous assumption that have<BR>

hurt you a lot.</FONT><FONT COLOR="#0f0f0f" BACK="#ffffff" SIZE=3 PTSize=10><BR>

<BR>

----- Headers -----

<BR>

Return-Path: <brownphd@compuserve.com><BR>

Received: from rly-za04.mx.aol.com (rly-za04.mail.aol.com [172.31.36.100]) by air-za05.mail.aol.com (v56.24) with SMTP; Fri, 05 Feb 1999 10:44:49 1900<BR>

Received: from dub-img-8.compuserve.com (dub-img-8.compuserve.com [149.174.206.138])<BR>

by rly-za04.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0)<BR>

with ESMTTP id KAA22482 for 8 - Name - Whistleblower Regarding ... ;<BR>

Fri, 5 Feb 1999 10:44:42 -0500 (EST)<BR>

Received: (from root@localhost)<BR>

by dub-img-8.compuserve.com (8.8.6/8.8.6/2.17) id KAA03305<BR>

for 8 - Name - Whistleblower Regarding ... Fri, 5 Feb 1999 10:44:43 -0500 (EST)<BR>

Date: Fri, 5 Feb 1999 10:44:13 -0500<BR>

From: "Laura S. Brown" <brownphd@compuserve.com><BR>

Subject: Re: Rosalie's so called "seduction"<BR>

Sender: "Laura S. Brown" <brownphd@compuserve.com><BR>

To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Faci...

Message-ID: <199902051044\_MC2-695C-853D@compuserve.com><BR>

MIME-Version: 1.0<BR>

Content-Transfer-Encoding: quoted-printable<BR>

Content-Type: text/plain; charset=ISO-8859-1<BR>

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</HTML>

Laura's  
response

JD  
8-10-99

000023

Subj: Re: Rosalie's so called "seduction"  
Date: 2/5/99 12:45:19 AM Pacific Standard Time  
From: 8 - Name...  
To: brownphd@compuserve.com

I first need to tell you that for some reason two blank emails got sent to you. I don't know how to use the new 4.0 America Online yet and when I hit "reply" it sends the email before I have typed anything. Strange.

Anyway, I need to address this issue with Art saying that he feels Rosalie has been seductive. I want to make very clear that I understood that he meant it in a non-sexual way, although his wording could have been used differently. Strong accusations as such have powerful impacts and one, who is supposed to be a professional, is to be careful about wording.

I do not feel Rosalie has been seductive. At the time he told me this was during a period of time, approx. two weeks ago, when my issues were stirred up. I was angry with Rosalie and trying to process that anger. What became very confusing was Art not supporting me seeing her or working things out, nor recognizing that I was literally experiencing flashbacks/triggers and emotional. A lot was happening and he was validating my confusion as truths which only made things more confusing and out-of-control for me. What even made things worse was he had always been supportive of Rosalie and me working things out then he was telling me that she was "seducing me" and a contributor to my anxiety and not to go back. He supported me not seeing her again and told me to not give into the anxiety/grief at losing her as a therapist. It would seem to me that if he was clean about his intentions, then he would have made the efforts to help work things through with Rosalie...and if he had issues with the way she was behaving or not doing her job...then he should have consulted with her.

I do not know how he can point the finger at her and say that she was messing up, crossing boundaries, not listening, being inappropriate, seducing...whatever it is...when (1) she doesn't talk about her sexual life with me nor mentions her husbands sexual experiences. (2) she has made herself available to me when needed in the form of phone conv. and extra appointments actually less than he has. (3) She doesn't make comments about sex or talk about sexual things in nature that are not therapeutic (4) She doesn't cry and regress during my sessions and talk about her incest issues. (5) She has always wanted to work things out especially when I have confronted her. She doesn't go into panic like Art does and become defensive and tell me that she "hopes I find help for myself and the anxiety" kick me out when I confront her or am angry. (6) She doesn't say "it's okay to be angry with me and then get defensive and fight back like he does. (7) I don't believe that she lies to me. She is a honest woman full of integrity. When brought to her attention something she is doing wrong, she admits. (8) She doesn't pose to "be an expert and go off on some ego trip. (9) she has nothing to be guilty of. She knows her boundaries and keeps them...she's not rigid and scared. (My instructor at school told me that "when a therapist keeps rigid boundaries, it's not about protection for the client, it's because they don't trust themselves").

He has no right to be critical of her. The way he got when I confronted him last Tuesday, shaking, dry mouth, turning white, cowering and being defensive is just an example of not being competent. It was pathetic and if he had nothing to be guilty of, then he wouldn't have responded in that manner. If he had not been inappropriate then he would have worked things out instead of saying we are ending this therapeutic relationship and by kicking me out of his office. You see, Rosalie would have never done that, she would have worked things out because she is clean, honest and competent enough to work things through. she doesn't buckle when I am angry or confrontive. Needless to say, it pisses me off that he's pointing the finger at her. You know the old adage, "when you point the finger at someone, you have three pointing back straight at you". Once again, he has no right what-so-ever in being critical of another therapist!!! It is totally unethical for him to be telling or turning me against another therapist! This I know from the psych. class I dropped out of.

8 - Name - W...

8-10-99

000024

Subj: Re: Art Peskind  
Date: 2/4/99 6:30:51 PM Pacific Standard Time  
From: brownphd@compuserve.com (Laura S. Brown)  
Sender: brownphd@compuserve.com (Laura S. Brown)  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facilit...

The ones I was able to confront him about to date; the gerbil comment, the NY watching porn comment. He vaguely recalls the Sydney Royer comment.

Thanks for having sent me the list of things. I will be going over it with him when we next meet.

I have told him that I expect him to make amends to you, based on what you ask of him, and he has agreed to that.

---

Headers

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Received: from rly-yc04.mx.aol.com (rly-yc04.mail.aol.com [172.18.149.36]) by air-yc02.mail.aol.com (v56.24) with SMTP; Thu, 04 Feb 1999 21:30:50 -0500  
Received: from hil-img-9.compuserve.com (hil-img-9.compuserve.com [149.174.177.139]) by rly-yc04.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0) with ESMTP id UAA29216 for <Ecc110@aol.com>; Thu, 4 Feb 1999 20:18:29 -0500 (EST)  
Received: (from root@localhost) by hil-img-9.compuserve.com (8.8.6/8.8.6/2.17) id UAA13003 for 8 - Name - Whistleblower R... Thu, 4 Feb 1999 20:18:29 -0500 (EST)  
Date: Thu, 4 Feb 1999 20:18:08 -0500  
From: "Laura S. Brown" <brownphd@compuserve.com>  
Subject: Re: Art Peskind  
Sender: "Laura S. Brown" <brownphd@compuserve.com>  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - R...  
Message-ID: <199902042018\_MC2-6953-D0EC@compuserve.com>  
MIME-Version: 1.0  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain; charset=ISO-8859-1  
Content-Disposition: inline

JD  
8-10-99

Subj: More questions???  
Date: 2/4/99 4:10:55 PM Pacific Standard Time  
From: 8 - Name...  
To: brownphd@compuserve.com

To which of these have he admitted to saying?

- (1) Describing a man he saw who had a girl friend that was a stripper with big "tits" and how when the man left the room, she stuck them out at him.
- (2) Describing pornography he watched in NY where in his words, " the man was fucking two women and saying you fucking bitch ect...". Stating that he was "open minded about sex."
- (3) Talking about having sex to aliviate anxiety with his wife.
- (4) In the 70's hearing his brother or brother-in-law and sister or sister-in-law making love in the other room and how noisy it was.
- (5) Describing his wife as homely and sickly
- (6) Using finger gestures to describe incest with my brother, specifically poking his finger into the other hand where the thumb and forefinger made a hole.
- (7) Gay men putting "Gerbals up their ass" When asked why they did that, he replied that it "feels good" then asked about the risk of getting bit, he replied " they don't bite their caves."
- (8) Telling me I was "fat" and making a joke by saying "I can see you've been cramming for that". This happened during finals week.
- (9) When I changed my hair color and length, he agreed that I needed to change it back.
- (10) Lying to me about being an expert witness for Sam Pemberton, when Sam informed me that he never heard of Art, And when I confronted him on it, he got up pulled out a file, showed me it (someone elses file ) and said it was Sam Saunders. There is no Sam Saunders the attormery. When I confronted him on Tuesday he came up with another name.
- (11) Leading me on to believe that he was the "anxiety expert" and agreeing that others will not understand anxiety and be able to help me. In my opinion, this only harbors dependency which he seems to need to make him feel important.
- (12) While in a vulumable and confused state, he told me that Rosalies "was seducing me" by harboring dependency in the form of "being a mother to me and protraying this "family like" atmosphere inviting me in and not being there on Christmas. by saying that an oath for psychologist is "to do no harm" this was implying that Rosalie was doing ham. He also stated that she was the source of anxiety and agreed not to see her. Telling me "I was clear" when I was confused and in a spin with issues that dealt with her and family of origion--this, in part, led me to a state of suicide approximately two weeks ago.
- (13) Telling me about seeing movies like "Deep thoat ect.." that he liked erotica...that his wife liked it more.
- (14) When confronted with the inappropriateness of talk, he became defense, as usual and trying to end therapy with me in a way that came across as abandonment.
- (15) Disclosing with you, whether how small the information, when I told specifically not to disclose with anyone.

910 8-10-99 000026

(16) Saying he took me seriously, when Rosalie and Audrey didn't seem to, specifically Rosalies and then telling you "I was doing okay". this is an example of being dishonest.

(17) "Trusting" him to get me free samples of anti-depressants which were to come from him.

(18) By being defensive when I told him to never lie to me. He acted guilty.

(19) Telling me that Sydney Royer was gorgeous.

(20) Telling me that you were "fat too"

(21) Leading me on to believe that he wrote numerous articles on anxiety and acting like "his name should have been publication about anxiety".

(22) Crying in sessions, approximately two. One he teared up surrounding a conflict when he make a joke about the "cramming for a test" (meaning my weight). and in November, crying, regressing like a child and talking about his "dad waking him up at night to show him porn and enjoying it while he got an erection".

I need you to know that his has made dirty jokes...ones which I can't remember. and there is more that I am unable to remember. These are in no particular order. They all are significant in nature.

I also need you to know that it is not my job to take care of him. I am devastated by this all.

If you could email me back with was he is specifically is taking responsibility for I would appreciate it as you facilitate this process.

8 - Name - Whistleblow...

910  
8-10-99

000027

Subj: Re: More Questions???  
Date: 2/4/99  
To: brownphd@compuserve.com

I was not comfortable hearing him call you "fat"—that was the point. I do not like the word to describe anyone...it's a prejudice comment. I told you it because it offends me...I didn't tell you that to inflame you. I feel once again like you are defending him...and to be honest, it does bother you deep down to be overweight...it's not okay to be called "fat" and to hear him use that term.

When I confronted him on Tuesday to be more clear what he meant by Rosalie's being "seductive", he explained that it was not meant to be sexual seduction but one of "inviting me in to be family" and then not being there...something like that. I knew he didn't mean it to be sexual. When he feels there was a "seductive element to Rosalie's dynamic with me" what about his own. He's quick to point the finger...what a hypocrite. He is obviously NOT the expert on boundaries as he has proven that twice. He knows that too. He's trying to trip you up.

It doesn't surprise me that he feel "clueless" to how I might "have interpreted any of this as sexualized" because he is unethically incompetent, sneaky and dishonest. He's trying to save his ass and is going to dupe you...he's ego and reputation is on the line. When one gets too evolved in ones "ego" one often loses sight and becomes "clueless" (this even goes as far as to what they used to represent and defend). You know better then to think one who perpetrates can be "rehabilitated".

As far as the antidepressants...he was going to get them for me and give them to me. PERIOD.

It's strange...if this was not a therapist you knew or so called "rehabilitated" you would be enraged—out raged at the conduct...you would not hesitate to pass judgment. You would proclaim to be for the "victim" and stand up for their rights. My question is have you let your ego get in the way of your judgment? Have you lost sight of what is important to you and what you defend so dearly? Is it that you may not have the power to "rehabilitate" and you slipped up...and that's hard to face? That all of this makes you look bad. So who are you trying to facilitate for?

You can print this out and go over these with him.

8 - Name - Whistle...

JD  
8-10-99

Subj: More questions???

Date: 2/4/99 5:26:10 PM Pacific Standard Time

From: brownphd@compuserve.com (Laura S. Brown)

Sender: brownphd@compuserve.com (Laura S. Brown)

To: 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facilit...

8 - Name ... - so far the only ones have been the gerbil, the NY porno one, and vaguely remembering the Syd Royer comment. About the meds; he says that he might have said that he could arrange for a referral or to get samples if you couldn't afford a med

He does admit to saying that there was a "seductive" element to some of the dynamics with Rosalie, but was clueless that you might interpret this as sexual. In fact, is being pretty entirely clueless that you might have interpreted any of this as sexualized, which concerns me, which I have told him.

He had admitted to using the word "fat" with you back when it happened. I am personally comfortable with his having used that term to describe me, as I use it myself to describe myself. And about me, it's true, I don't consider it an insult, just a description.

Other than that I didn't recall as much of this as you've emailed to me, and feel like I've barely had a chance to scratch the surface. I'll gonna print this out; do I have your permission to go over each of these with him when he next meets with me? Let me know.

---

Headers

Return-Path: <brownphd@compuserve.com>

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Thu, 4 Feb 1999 20:20:19 -0500 (EST)

Received: (from root@localhost) by ari-img-2.compuserve.com (8.8.6/8.8.6/2.17) id UAA21846 for Eccl10@aol.com; Thu, 4 Feb 1999 20:20:19 -0500 (EST)

Date: Thu, 4 Feb 1999 20:18:04 -0500

From: "Laura S. Brown" <brownphd@compuserve.com>

Subject: More questions???

Sender: "Laura S. Brown" <brownphd@compuserve.com>

To: "8 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - ..."

Message-ID: <199902042018\_MC2-6953-D0E5@compuserve.com>

MIME-Version: 1.0

Content-Transfer-Encoding: quoted-printable

Content-Type: text/plain; charset=ISO-8859-1

Content-Disposition: inline

JD 8-10-99



what you defend so dearly? Is it that you may not have the power to "rehabilitate" and you slipped up...and that's hard to face? That all of this makes you look bad. So who are you trying to facilitate for?

-I hope not, <sup>8 - Name - ...</sup> But those are very important questions. I want to facilitate for you to get the outcome you want here-

*Laura's Response*

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Return-Path: <brownphd@compuserve.com>  
Received: from rly-ya03.mx.aol.com (rly-ya03.mail.aol.com [172.18.144.195]) by air-ya01.mail.aol.com (v56.24) with SMTP; Fri, 05 Feb 1999 10:45:15 1900  
Received: from arl-img-8.compuserve.com (arl-img-8.compuserve.com [149.174.217.138]) by rly-ya03.mx.aol.com (8.8.8/8.8.5/AOL-4.0.0) with ESMTP id KAA22307 for <sup>8 - Name - Whistleblower Regar...</sup>  
Fri, 5 Feb 1999 10:45:10 -0500 (EST)  
Received: (from root@localhost) by arl-img-8.compuserve.com (8.8.6/8.8.6/2.17) id KAA15165 for Eccl10@aol.com; Fri, 5 Feb 1999 10:45:12 -0500 (EST)  
Date: Fri, 5 Feb 1999 10:44:19 -0500  
From: "Laura S. Brown" <brownphd@compuserve.com>  
Subject: Re: More Questions???  
Sender: "Laura S. Brown" <brownphd@compuserve.com>  
To: <sup>8 - Name - Whistleblower Regarding Health Care Provid...</sup>  
Message-ID: <199902051044\_MC2-695C-8547@compuserve.com>  
MIME-Version: 1.0  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain; charset=ISO-8859-1  
Content-Disposition: inline

*JD*  
*8-10-99*

Subj: A message from 8 - Name - Whistleblower...  
Date: 2/4/99 6:55:17 AM Pacific Standard Time  
From: brow nphd@compuserve.com (Laura S Brown)  
Sender: brow nphd@compuserve.com (Laura S Brown)  
To: 8 - Name - Whistleblower Regarding Health Care Provider or H...

That's fine with me; I understand how difficult this is being for you, and I want to facilitate the process for you

My recollection of our conversation, I told you that Art admitted to saying some of the sexualized statements you reported to me. I told you that I hadn't had time yet to discuss with him the other issues you've raised, but that I will when he meets with me in person. I told you that I am expecting him to make a meaningful amends to you for his behavior. I asked you to think about what you would want from him that would feel like a real amends, not just a blow-you-off apology.

You let me know that you feel extremely devastated, angry, and betrayed by Art's actions; that he has re-evoked many incest dynamics; that you have dropped out of psychology classes because of this; that in the past month you felt suicidal in response to his statements. That you believe that I and other therapists will let him off the hook. That you don't know what amends would be, or if they are possible.

I asked you to send me in writing the things that Art has done that you have been hurt by so that I can deal with him about them.

You also told me to tell Art to be very afraid.

That's what I recall from our conversation, I'm not claiming that this is the complete record, but my best recollection, I'm open to any feedback.

Laura Brown

----- Headers -----  
Return-Path: <brow nphd@compuserve.com>  
Received from rly-yb04.mx.aol.com (rly-yb04.mail.aol.com [172.18.146.4]) by air-yb02.mail.aol.com (v56.24) with SMTP, Thu, 04 Feb 1999 09:55:17 -0500  
Received from art-ling-10.compuserve.com (art-ling-10.compuserve.com [149.174.217.140]) by rly-yb04.mx.aol.com (8.8.8.8.5/AOL-4.0.0) with ESMTP id JAA22134 for 8 - Name - Whistleblower ...  
Thu, 4 Feb 1999 09:55:16 -0500 (EST)  
Received (from mailgate@localhost) by art-ling-10.compuserve.com (8.8.8.8.6/2.17) id JAA20771 for 8 - Name - Whistleblower Regarding Health Care Provider or Health Care Faci...  
Date: Thu, 4 Feb 1999 09:54:50 -0500  
From: "Laura S. Brown" <brow nphd@compuserve.com>  
Subject: A message from 8 - Name - Whistleb...  
Sender: "Laura S. Brown" <brow nphd@compuserve.com>  
To: 8 - Name - Whistleblower Regarding Health Care Provider or Hea... >  
Message-ID: <199902040955\_MC2-693C-257C@compuserve.com>  
MIME-Version: 1.0  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain; charset=ISO-8859-1  
Content-Disposition: inline

JD 8-10-99

Subj: A message from 8 - Name - Whistleblower Reg...  
Date: 2/3/99 9:10:32 PM Pacific Standard Time  
From: 8 - Name - ...  
To: brownphd@compuserve.com

Hi Laura,

I was wondering if you could reiterate the conversation today. As you are well aware (I think?), I am very distressed by this situation and am having difficulty remembering all that we talked about. If you could put it down in writing, I will be able to process it better. It might be a good idea to do that from now on instead of speaking on the phone (I'm not saying speaking on the phone in the future but for right now).

Thank you,

8 - Name - Whistleblow...

JD 8-10-99

000032



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
*Olympia, Washington 98504*

March 15, 1999

8 - Name - Whistleblower Regarding Health Care Provider o...

RE: Laura S. Brown, Ph.D.  
Case No. 99-02-0006PY


Dear 8 - Name - Whistlebl...

Your recent complaint regarding Laura S. Brown, Ph.D., has been referred to the Investigation Service Unit of the Department of Health, for investigation. The investigator that has been assigned to your complaint is:

**Jeffrey O. Yoshinaka, Health Care Investigator**  
**Investigation Service Unit**  
**P.O. Box 47874**  
**Olympia, WA 98504-7874**  
**Phone: (360) 236-4654 FAX: (360) 586-0123**

Due to recently enacted legislation, RCW 43.70.075, regarding confidentiality, we ask that you read, sign and return the enclosed "Whistleblower Release Form" within fourteen (14) days after your receipt of this letter. A postage paid envelope has been included for your convenience. Thank you for your cooperation in this matter.

Respectfully,

  
Roxanne Bogart  
Administrative Assistant

Enclosure: Whistleblower Release Form

000033  
♻️

**STATE OF WASHINGTON**  
**DEPARTMENT OF HEALTH**  
**WHISTLEBLOWER RELEASE FORM**

**RCW 43.70.075 provides in part: "The identity of a whistleblower who complains, in good faith, to the Department of Health about the improper quality of care by a health care provider, or in a health care facility, as defined in RCW 43.72.010 shall remain confidential..."**

I understand that my identity is confidential pursuant to RCW 43.70.075 (DOH Whistleblower Statute). By signing this document, I waive my right to confidentiality and authorize the Department of Health to release my identity to Laura S. Brown, Ph.D., Respondent, to other persons who are reasonably necessary to the investigation, and for use in any subsequent administrative proceeding regarding my complaint. I understand that my identity will not be released for any other purpose.

**APPROVAL OF CONFIDENTIALITY WAIVER**

For the sole purpose of investigating my complaint and pursuing disciplinary/adverse action proceeding, I hereby waive confidentiality and consent to the release of my identity.

**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Home Phone:** \_\_\_\_\_  
**Day Phone:** \_\_\_\_\_

**DENIAL OF CONFIDENTIALITY WAIVER**

I hereby deny my waiver of confidentiality and deny consent to release of my identity. I understand this denial may impair the Department of Health's ability to pursue disciplinary/adverse actions.

**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Home Phone:** \_\_\_\_\_  
**Day Phone:** \_\_\_\_\_

**CASE #: 99-02-0006PY**

**RESPONDENT: Laura S. Brown, Ph.D.**

**000034**



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
1300 SE Quince Street • Olympia, Washington 98504

February 25, 1999

8 - Name - Whistleblower Regarding Health Care Prov...

Dear 8 - Name - Whistl...

The Examining Board of Psychology has received your report concerning Laura Brown, Ph.D.

Under the provision of RCW 18.130.095 of the Uniform Disciplinary Act, the Board is the agency within State government with legislated authority and responsibility to assure the delivery of safe psychological care. The Board is empowered to investigate all allegations and complaints to determine whether such allegations are substantiated, and to take disciplinary or corrective action.

A file has been opened under the number 99-02-0006PY. An assessment of your report is being conducted by the Board of Psychology. When the Board has made a decision regarding this report you will be contacted in writing.

If you have any questions, please contact the Examining Board of Psychology at the address or telephone number below.

Sincerely,

Sharon E. Strachan, Administrative Assistant  
Examining Board of Psychology  
1300 SE Quince St  
P O Box 47869  
Olympia WA 98504-7869  
(360) 236-4928

Enclosure



000035

Redaction Summary ( 533 redactions )

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8 Privilege / Exemption reasons used:

- 1 -- "Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation." ( 23 instances )
- 2 -- "Attorney-Client Privileged - RCW 5.60.060(2)(a), RCW 42.56.070(1) - Communications between attorney and client or between clients for the purpose of gathering information or providing or obtaining legal advice." ( 1 instance )
- 3 -- "DOH Licensee Health Professional Home Address and/or Home Phone Number - RCW 42.56.350(2)" ( 1 instance )
- 4 -- "DOH Licensee Social Security Number - RCW 42.56.350(1)" ( 1 instance )
- 5 -- "Healthcare Information Readily Identifiable to a Person - RCW 42.56.360(2), RCW 70.02.020(1), RCW 42.56.070(1)" ( 2 instances )
- 6 -- "Investigative Records Compiled by agency investigative and law enforcement unit; and non-disclosure is essential to effective law enforcement or for a person's privacy. - RCW 42.56.240(1)" ( 1 instance )
- 7 -- "Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1)" ( 261 instances )
- 8 -- "Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1)" ( 243 instances )

Redacted pages:

Page 10, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 19, Investigative Records Compiled by agency investigative and law enforcement unit; and non-disclosure is essential to effective law enforcement or for a person's privacy. - RCW 42.56.240(1), 1 instance

Page 42, DOH Licensee Social Security Number - RCW 42.56.350(1), 1 instance

Page 104, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 3 instances

Page 104, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 2 instances

Page 105, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 3 instances

Page 106, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 2 instances

Page 106, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 6 instances

Page 109, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 2 instances

Page 110, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 112, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 115, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 116, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 119, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 120, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 121, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 126, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 127, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 130, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 130, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 1 instance

Page 131, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 1 instance

Page 139, Attorney-Client Privileged - RCW 5.60.060(2)(a), RCW 42.56.070(1) - Communications between attorney and client or between clients for the purpose of gathering information or providing or obtaining legal advice., 1 instance

Page 139, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service



agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 1 instance

Page 140, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 141, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 143, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 161, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 162, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 163, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 165, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 168, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 169, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 170, Attorney Work Product - RCW 42.56.290 - Drafts, notes, memoranda, statements, records or research reflecting the opinions or mental impressions of an attorney or attorney's agent that reveal factual or investigative information prepared, collected, or assembled in litigation or in anticipation of litigation., 1 instance

Page 170, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance

Page 176, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance

Page 193, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance

Page 194, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 2 instances

Page 195, Healthcare Information Readily Identifiable to a Person - RCW 42.56.360(2), RCW 70.02.020(1), RCW 42.56.070(1), 2 instances

Page 195, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 13 instances

Page 195, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 14 instances

Page 196, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 23 instances

Page 196, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 2 instances

Page 197, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 32 instances

Page 197, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 8 instances

Page 198, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 16 instances

Page 198, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance

Page 199, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of

providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 24 instances  
Page 199, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 8 instances  
Page 200, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 45 instances  
Page 200, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 16 instances  
Page 201, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 21 instances  
Page 201, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 24 instances  
Page 202, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 19 instances  
Page 202, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 13 instances  
Page 203, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 20 instances  
Page 203, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 15 instances  
Page 204, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 10 instances  
Page 204, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 20 instances  
Page 205, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 26 instances  
Page 206, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 7 instances  
Page 207, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 12 instances  
Page 207, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 4 instances  
Page 208, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 7 instances  
Page 208, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 2 instances  
Page 212, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 6 instances  
Page 213, Mental health information, Adults - Information and records compiled, obtained, or maintained in the course of providing mental health services to voluntary or involuntary recipients of services at public or private mental health service agencies. RCW 70.02.230 (1), RCW 42.56.070(1), 3 instances  
Page 213, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 2 instances  
Page 214, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance  
Page 216, DOH Licensee Health Professional Home Address and/or Home Phone Number - RCW 42.56.350(2), 1 instance  
Page 216, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 6 instances  
Page 217, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance  
Page 218, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance  
Page 220, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1), 1 instance  
Page 221, Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW

Page 5